

## **2.4 Business - section 32 evaluation for the Proposed Auckland Unitary Plan**

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## **1 Overview and Purpose**

This section summarises the major resource management issues and concepts that relate to business activity, including the wellbeing it provides the wider Auckland community and the effects and implications of where business activity is located.

### **1.1 Subject Matter of this Section**

The location, extent, and appropriateness of business activities (retail, commercial and industrial) are linked to Auckland's economic well-being.

The Proposed Auckland Unitary Plan (the Unitary Plan) business provisions address the resource management issues relating to how business land, employment opportunities and social, commercial and amenity opportunities will be provided for and grow with the forecasted population increase. Growth challenges how and where business activities, encompassing industrial and commercial (retail and office) activities, will be located and its impacts managed. This produces a diverse range of considerations for council, including;

- the need for more business land. This is discussed in the S32 Urban Form and Land Supply report
- the distribution of commercial and industrial activity throughout Auckland, especially the proportion of commercial activity within centres, identified growth corridors and other areas
- the importance and scale of specific Auckland centres through the formation of a centres hierarchy
- providing for and managing activities within industrial zones to support jobs and industrial growth
- managing the scale and number of business parks and the degree to which these can develop and remain compatible with the centres hierarchy and urban form
- managing the form and growth of the centres network, to provide focal points for commercial and community activity, including:
  - the city centre as considered in a separate s32 City Centre report
  - built form is dealt with more substantially in the S32 Business Building Form Design report

The following summarises some of the resource management issues and why they are relevant to business.

#### ***Auckland will need significantly more business land***

The Auckland Plan (p157) suggests that by 2041 at least 1400ha of additional business land will be needed to provide 12.5 million m<sup>2</sup> of new floor space, made up of approximately:

- 6,050,000m<sup>2</sup> for industry
- 3,000,000m<sup>2</sup> for offices
- 1,800,000m<sup>2</sup> for retail and hospitality space
- 1,650,000m<sup>2</sup> for education and health.

#### ***Business land needs vs. compact urban form***

Council must integrate business land use and development with Auckland's strategic infrastructure to help achieve a quality compact urban form. Business land use patterns affect the way Auckland's natural and physical resources are managed and are intertwined with infrastructure provision, efficiency and capacity. To meet the sustainable management purpose of the RMA, both the Environment Court and Auckland Council have accepted that intervention in the distribution of land use activities, including retail and other business activities, is appropriate.

Council must ensure that business opportunities are enabled, so that business activities can grow with the forecasted population increase. This is to ensure that the people and

households of Auckland can meet their needs for new jobs, places to socialise and be entertained, as well as buying goods and services. This land use change affects where and how we work, live and socialise and, if not appropriately managed, such change can adversely affect the sustainability of Auckland's natural and physical resources.

Auckland should have a distribution of business activity that integrates with strategic and community infrastructure, existing and new residential and commercial centres, and industrial zones. This is to secure desired outcomes described both in the Auckland Plan and Unitary Plan, and to sustainably manage effects. If business growth is not enabled and its distribution not managed, the resulting development patterns are likely to produce adverse environmental effects and costs to the community.

Changes in business land use can also undermine the ability of significant infrastructure to function efficiently and effectively. For example dispersed commercial activity can reduce the capacity of metropolitan and town centres to function efficiently and connect with higher density residential opportunities and transport networks.

Intervention in the distribution of commercial and industrial activity is therefore required to manage these potential adverse effects. The basis for intervention in the distribution of business activities is similar to that applied to residential growth in achieving the wider backdrop of a strategic urban development framework. Auckland Council recognises the need to restrict the spread of residential development, using the RUB, because the cost of allowing dispersal would be significant. These costs include increased infrastructure costs, reduced transport efficiencies and increased emissions, costs to wider planning initiatives such as improving the liveability of existing urban environments, and inefficient land use.

### ***Business distribution and management as a resource management issue***

Structures are part of the built environment (commercial centres, industrial buildings, community facilities, road network, piped infrastructure, etc) and represent physical resources to be sustainably managed and developed, to enable people and communities to provide for their social, economic and cultural well-being. Existing commercial centres represent considerable public and private investment.

In addition to the physical structures, the business activity associated with the built environment can also be considered a resource management issue under the Act. Understanding the concepts of enablement (the ability for individuals and businesses to do things) and distribution (where such businesses are located) are important when considering these resource management issues.

#### Enablement

The concept of enablement is a key part of the Act's purpose. The value of commercial centres lie not only in their public and private infrastructure, but in the social relationships they represent. In this way, the distribution of business activity, and retail distribution in particular, can have both enabling and disenablement consequences. Well-being may be enabled through increased retail expansion across the region, but if this expansion is dispersed and centres decline, well-being is negatively affected, and the community can be said to be disenabled. This 'disenablement' happens when existing centres, which local communities rely on, experience significant decline.

Enablement comes down to balancing 'market' demands against the wider community needs and integration with wider urban form and growth. How commercial activity is distributed throughout the region will determine the community's level of enablement. See the following discussion on commercial distribution as well as Appendix 3.4.1, which discusses case law relating to enablement and distribution.

### Distribution and the effects associated with commercial distribution

Commercial activities can be located in-centre or out-of-centre (dispersed). In reality, the distribution of commercial activities throughout the region is a mixture of both. There are a number of positive effects of dispersed commercial activities. These can include improved access to goods and services, opportunities for growth and development to meet demand, and reducing congestion at existing commercial centres.

The adverse effects of dispersed commercial distribution are not always well understood or easily identified. Some are obvious, such as effects on the environment or traffic generation, while others relate to integrated management (as required in s. 30 and 31 of the Act). The considerations range from direct local effects to those of a more regional nature which incorporate cumulative and strategic effects.

Some adverse effects relate to investment in infrastructure. Auckland has significant public investment in the infrastructure of its existing commercial centres, and particularly in centres with high activity (metropolitan and town centres) where infrastructure location and its initial and ongoing costs can be justified. This ranges from roads and amenity improvements to community facilities such as libraries and parks, community centres and swimming pools.

Dispersed commercial activity to out-of-centre locations, or to new areas away from centres of high activity, can lead to:

- decreased use and pressure for duplication
- significant negative social effects for the community reliant on the facilities
- significant negative effects for both public and private providers of infrastructure in terms of decisions around upkeep or duplication
- in transport terms, lower efficiencies of use in-centre and decreased public transport usage, and increased transport infrastructure costs overall.

Other adverse effects include a decrease in private investor confidence in commercial centres and industrial zones, and whether they invest in the physical infrastructure. Private developers as well as council want and need a degree of certainty around investment in infrastructure, and this is linked to the distribution of business and retail in particular.

Commercial investors allocate funds based on confidence that a level of integrity exists in relation to planning policy, so that their investment in one area will not be ultimately undermined by investment into another area.

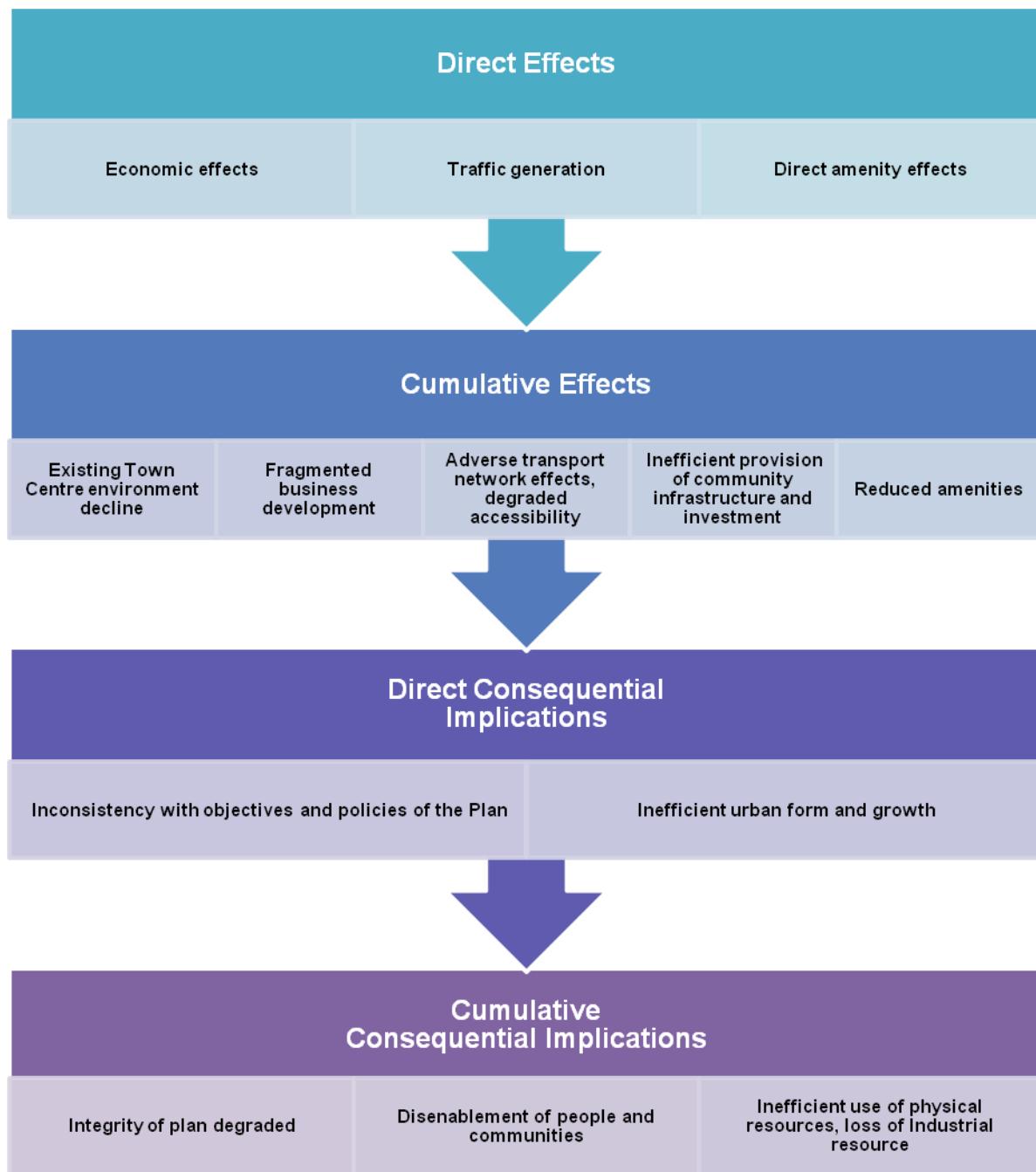
In terms of the effects on the centres themselves, the adverse effect of dispersed retail activity is not considered in terms of the adverse effect on the individual retail activities within centres. This is a trade competition issue that is not considered relevant under the Act.

Relevant adverse effects occur only where dispersed retail activity affects key businesses in an existing centre to such a degree that the centre's viability is eroded. This causes a decline in its function and amenity and disenables the people and communities who rely upon those centres for their social and economic well-being. These adverse effects must be significant before they could properly be regarded as going beyond the effects ordinarily associated with trade competition (see Appendix 3.4.1).

Council should therefore intervene in the location of commercial activity only if the distributional effects have a real prospect of substantially threatening the viability and function of Auckland's existing commercial centres, and adversely affecting people and communities.

The effects of dispersed commercial distribution are summarised in Figure 1 below.

#### **Figure 1: Effects of dispersed commercial distribution**



The distributional effect a retail activity can have depends on its type.

Retail activity ranges from traders with very low business or trade sales (such as supermarkets) to those with almost total business or trade sales (such as 'the Tile Warehouse' or Placemakers). Those traders that are critical to centre function and community wellbeing are found at the former (or retail) end of the spectrum, whereas the latter (wholesale) has little potential for adverse distributional effects. In between are those that draw custom from both ends of the spectrum, such as Bunnings or Mitre 10 Mega.

Some retail activity creates few adverse distributional effects and based on current case law it is difficult to stop them from locating in non-retail business zones purely on the basis of distribution effects. Such retailers should be largely enabled both inside and outside

commercial centres in general business zones and to a limited extent in industrial zones, subject to reverse sensitivity and capacity considerations. Accordingly, definitions that relate to retail activities such as trade suppliers, service stations and even small food and beverage outlets are excluded from restrictions on retail activities as applied to these zones.

There are small-scale commercial service, convenience retail or community activities with scale, intensity and localised catchments that can be appropriately located within residential zones due to the local benefits they deliver. Limitations need to be placed on the extent and scale of retail activities within residential, open space and rural zones to maintain the integrity of the zone outcomes, and also to consider any potential significant distributional effects on nearby or adjoining commercial centres.

Large format retailing cannot always be easily accommodated within existing centres, due to large floor-plates, in-centre rents and design requirements, and fragmented land titles. These limitations are present in Auckland and some managed capacity for large format retail should be provided in out-of-centre locations to enable this form of retail. These locations may be subject to constraints on transport, urban form and amenity.

In summary, commercial distribution is a resource management issue with implications for:

- physical resources comprised of buildings and transport infrastructure
- social and economic well-being
- amenity
- efficient use of resources
- maintenance and enhancement of the quality of the environment.

#### ***Centre capacity and providing for additional demand***

As Auckland's population grows, the region will need more retail and commercial activity to provide goods and services and employment for growing household numbers (see Appendix 3.4.3 for a background to retail growth projections).

Auckland Council does not need to specifically anticipate the extent of future retail market changes, or achieve an exact match between demand and land supply. Rather, the objectives and policies of the Unitary Plan must be sufficiently broad to cope with fluctuating demand and balanced against the other outcomes sought in terms of urban form, residential densification and transport objectives. The Unitary Plan should ensure that a centres approach to managing commercial activity is supplemented with:

- a policy focus on providing capacity within and adjacent to the existing network of centres
- opportunities for new centre formation associated with greenfield housing opportunities
- appropriate regulation through zoning and rules to enable out-of-centre options where certain retail activities in centres may preclude fine-grained development or reduce amenity within a centre, or where an in-centre location is unachievable and distributional effects of the out-of-centre activities are minimised.

Combining a pure centres approach to managing commercial activity with the bullet points above enables a 'centres plus' approach that recognises that not all commercial activity can, or should, be located within centres.

#### ***Office decentralisation***

Agglomeration of commercial activity in centres creates economies of scale, synergies and improved production, ongoing confidence in existing centres and facilities, benefits to the surrounding community and contributes to better public transport.

There is a spectrum of office activities from large scale stand-alone offices to small offices that can support centres, to ancillary office activities in industrial zones. The challenge for the Unitary Plan is to support the objective in the Auckland Plan to locate commercial activity in-centre, while allowing enough flexibility in the office market to enable it to function efficiently and effectively. Current zoning identifies capacity for office activity within the network of commercial centres and the specifically zoned business parks.

### ***Industrial land demand***

The current level of industrial land is not adequate to meet estimated demand to 2031. See Appendix 3.4.4 for discussion on this subject. A lack of industrial zoned land is driving out occupiers and limiting opportunities to increase industrial output.

The industrial land market has seen increasing competitive pressure over the past decade from non-industrial activities seeking to establish within industrial zones. The ability of industrial activity to move to new locations is limited by spatial requirements that typically include:

- large land parcels
- vacant land
- good access to motorways and arterial roads
- relatively cheap land
- distance from sensitive activities
- consistent energy supplies.

Accordingly, the Unitary Plan focuses on:

- earmarking the majority of greenfield business land for industrial activity
- encouraging regeneration to non-industrial uses (eg housing and retail/office) in central locations that are well serviced by public transport, such as in the General Business and Mixed Use zones. Accordingly, some small pockets of historical industrial land in central locations are likely to continue to be lost to industrial use
- where there are coherent industrial areas of largely industrial uses, restricting the diversity of non-industrial uses to prevent cumulative loss of scarce industrial resource and avoiding increases in reverse sensitivity effects.

## **2 Overview and Purpose - Enabling Economic Well-being**

### **2.1 Subject Matter of this section**

The purpose of Section 3 of the RPS 'Enabling Economic Well-being' is to recognise, provide for, and manage the regional level business distribution issues that relate to the form, distribution and development of the broad range of commercial and industrial activities within Auckland.

The Unitary Plan provides an umbrella framework dealing with business activities and their distribution. Business activity and its distribution form a crucial component to the character and ongoing development of Auckland. The location of commercial and industrial activities underpins transportation networks and infrastructure servicing, as well as linkages to where people choose to live, work and play.

The distribution of business activity and the ability to provide for and promote ongoing demand requires planning intervention, to ensure appropriate flexibility for ongoing investment and also address both local and strategic adverse effects, including those associated with urban form and growth and the transport network. The objectives and policies of this section of the Unitary Plan provide the regional framework for the management and distribution of business activity, and its broader integration with infrastructure, the transport network and residential environments.

### **2.2 Resource Management Issue to be Addressed**

Section 3 of the RPS 'Enabling Economic Well-being' addresses two resource management issues. These are:

- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well-being;

Enabling Quality Urban Growth (Issue 1.1) is addressed in a number of ways throughout the Unitary Plan and is the subject of separate consideration in s.32 Urban Form and Land Supply. However, with respect to Section 3 of the RPS, the issue seeks to provide direct guidance to objectives and policies. Where capacity to enable urban growth is provided, there is a focus on a quality environment being achieved, as set out in the explanation to the issue. Issue 1.1 is addressed by Section 3 of the RPS, through ensuring that commercial activity is focused primarily into substantial commercial centres (as represented by the city, metropolitan, and town centres) and identified growth corridors (Objective 2 of the RPS – 3.1 Commercial and industrial growth) to support the preferred sustainable regional compact urban form, and that industrial growth is directed to appropriate areas (Objective 3 of the RPS – 3.1 Commercial and industrial growth).

Enabling Economic Well-being (Issue 1.2) is addressed principally through Objective 1 of the RPS – 3.1 Commercial and industrial growth with sufficient opportunities and capacity to provide for commensurate increases in business land and employment as household numbers increase. It seeks to place some weight on a compact urban form with commercial development primarily located within a hierarchy of commercial centres and identified growth corridors (Objective 2 of the RPS – 3.1 Commercial and industrial growth) and with industrial development being located appropriately (Objective 2 of the RPS – 3.1 Commercial and industrial growth).

Eleven specific policies are set out for these objectives, together with implementation methods for each policy. These policies in the RPS – 3.1 Commercial and industrial growth can be grouped as follows:

- 1) Policies seeking to ensure consideration of the environmental qualities of business development (policies 2, 3, 4, 5, 6, 7, 8, 9 and 11);

- 2) Policies seeking to ensure sufficient capacity for business growth (policies 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11).

### **2.3 Significance of this Subject**

The concept of enabling economic activity is not subject to a significant regional policy shift, as the Unitary Plan reflects particularly Change 6 to the Regional Policy Statement (RPS). However the scale and pace of change is given more direction from the Auckland Plan. It is significant in that the Unitary Plan proposes to continue the implementation of the RPS policy direction into district level planning, in the supply of business land and zonings, intensification in centres and on identified growth corridors, and also in the scale of physical change enabled within business areas.

The distribution and location of business activity plays a key role in the form and growth of urban Auckland. Business activity is vital to social and economic well-being.

The proposed Unitary Plan seeks to enable business activity while achieving high environmental standards through avoidance, remediation or mitigation of any adverse effects. Intervention with regard to the distribution, scale and function of business activity is critical to promote sustainable resource management and a compact urban form. This intervention is for two main reasons:

- (a) to achieve a distribution of business activity that integrates with:
  - i. strategic servicing and transport infrastructure;
  - ii. existing centre locations; and
  - iii. higher density residential living
- (b) there is strong demand for business and commercial activities in Auckland and if these are left unplanned there is an increased cost to the community.

In terms of the distribution of commercial activity, a compact urban form encourages more trips to be made by sustainable modes like walking and cycling, and provides for efficiencies in terms of public transport. At the same time, for some trips (such as accessing larger format retail activities) private transport will remain the primary mode for the foreseeable future, even with significant increases in public transport patronage.

The environmental, economic, social and cultural effects anticipated from the implementation of the enabling economic activity provisions include a quality built environment, increased productivity and economic growth, and greater opportunity for social and cultural vitality. Sufficient land and development potential will be available to meet current and future needs for differing business activities.

### **2.4 Auckland Plan**

The Auckland Plan Development Strategy recognises that strengthening Auckland as an international city relies on improved, balanced socio-economic development across Auckland, so that all residents share in its prosperity. It aims to improve economic performance by prioritising innovation and the clustering of activities. It acknowledges that a competitive Auckland requires a world-class city centre. The Development Strategy also promotes a better quality of life for all Aucklanders, by encouraging access to more housing and jobs, as well as opportunities for recreation, cultural, and leisure activities. To achieve sustainable development, Auckland's continued high population growth needs to be matched to a range of accessible, quality housing and employment choices. The emphasis is on growth in existing and compact urban areas which are served by efficient, safe public transport.

The Unitary Plan applies the approach of 'centres plus' from the Auckland Plan, with a recognition of the need for more overall opportunities for business growth, and alternative locations and business typologies.

Auckland Plan economic priorities include growing a business-friendly and well-functioning city; developing an innovation hub of the Asia-Pacific Rim; becoming internationally connected and export-driven; enhancing investment in people, to grow skills and a local workforce; and developing a creative, vibrant international city. The Auckland Plan directives include:

- 6.1- *Plan and provide for sufficient business-zoned land and infrastructure to achieve employment capacity targets and improved economic opportunity.*
- 6.2 - *Ensure an efficient and effective regulatory process with strong public – private relationships, and implement a streamlined regulatory process that offers reduced uncertainty around cost, timing and outcome.*
- 6.3 - *Protect, enhance and improve business-zoned areas and business improvement districts.*
- 6.4 - *Monitor demand and supply of business land activities in urban and rural Auckland.*
- 6.5 - *Develop conditions to promote entrepreneurial development and commercialisation of innovation, building on Auckland's unique advantages.*
- 6.6 - *Support sector precincts and infrastructure development, science and technology parks, and innovation centres for key industries.*
- 6.7 - *Explore all options to enhance Auckland's key economic sectors, including leveraging council-owned land through joint ventures, public-private partnerships, infrastructure assistance and other forms of collaboration.*
- 10.1 - *Adopt a Rural Urban Boundary in Auckland's Unitary Plan that provides for land capacity over the next 30 years.*
- 10.2 - *Plan for a seven-year average of unconstrained development capacity (zoned and serviced with bulk infrastructure) at any point in time with a minimum of five years' and a maximum of 10 years' capacity.*
- 10.3 - *Focus urban intensification in areas that have infrastructure in place or which can be provided in a timely and efficient manner, and close proximity and good walking access to community facilities, open space, high-frequency public transport, centres and business areas.*
- 10.4 - *Locate and develop greenfield areas as sustainable liveable neighbourhoods in a way that demonstrates the most efficient use of land and provides or supports local employment opportunities.*
- 10.8 - *Strengthen Auckland's network of metropolitan, town, local and neighbourhood centres so they are well-connected and meet community needs for jobs, housing, and goods and services, at a variety of scales. Auckland's network of centres will be the primary focus for retail and other commercial activity, providing a wide range of outlets in a competitive environment, while limiting out-of-centre retail and office development.*
- 10.9 – *Develop and manage business areas to complement centres, without undermining their role and function in the centres' network, and to provide for a diversity of opportunities for business and employment growth.*
- 10.10 - *Business park development should promote clusters of technology and innovation.*

## **2.5 Current Objectives, Policies, Rules and Methods**

The status quo alternative consists of continuing with the approach and objectives, policies and rules of the operative Auckland Council RPS and Regional and District Plans. In economic and business terms those plans represent a RPS approach similar to that of the proposed preferred alternative, and in particular for retail distribution with the relatively recent finalisation of Change 6 to the Auckland Council RPS.

The differences between the status quo operative plans and the preferred alternative are mainly in the Unitary Plan proposed 30 year RUB for land supply, increased physical scale of buildings for business activity, increased attention to the quality of the resultant built environment, and greater consistency of approach across Auckland. The operative sections of the Auckland Council District Plan (Rodney, North Shore, Waitakere, Manukau, Papakura,

Franklin, Auckland City Isthmus, Auckland City Central Area) are all in varying stages of giving effect to the RPS.

## **2.6 Information and Analysis**

The analysis based on these reports is primarily a qualitative assessment. Quantitative work includes the Capacity for Growth Study 2012, economic analysis of future employment and its locations, economic assessment of retail distribution and growth projections for population and employment. Background reports prepared for the Auckland Plan have also been used, and where appropriate updated, to assist the S32 assessment of the appropriateness of the business provisions.

As indicated above, there is quantitative work that has been prepared to support the retail provisions of the plan. The Auckland Retail Economic Evidence Base report was finalised in October 2013, after the release of the S32 report and is now included as Appendix 3.4.9. Although the S32 was released prior to the completion of this retail report, in some areas, figures from the report have been used (the reference given in these situations is Fairgray 2013). However the S32 as a whole has not been updated post the release of the retail report. Only this paragraph and the references to the retail report in the Information and Analysis sections have been updated.

See Appendix 3.4.3 for a further discussion of regional retail growth projections.

See 9.1 Information and Analysis for a full list of documents.

<b>Document</b>	<b>Purpose/Description</b>	<b>Date</b>	<b>Appendix</b>
Case law - centres and commercial activity		-	3.4.1
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Industrial Land Demand</i>	Short background to regional industrial land requirements, based on Property Economics 2009 predictions	2013	3.4.4
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Draft Auckland Plan – Technical Report: Centres and Corridors</i> Auckland Council	Analysis of centres strategy, hierarchy and criteria	2011	3.4.5
<i>Prioritising Centres</i> Auckland Council	Summarises the analysis of 80 centres across the Auckland region to aid the process of prioritising sustainable compact centres.	2011	3.4.6
<i>Group 1 Additional Greenfield Land Requirements, 2001-2031.</i> Market Economics	Projection of industrial greenfield land requirements	2007	3.4.7

Capacity for Growth Study Auckland Council	Report on residential, business and rural land availability in Auckland	2012	3.4.8
Auckland Retail Economic Evidence Base Fairgray, S RIMU Auckland Council	Existing retail distribution, and region-wide retail supply-demand balance	2013	3.4.9

### **Capacity for Growth Study 2012**

In total there are 7,122 hectares of zoned business land across Auckland. Of this total, 716 ha (10% of the current total business zoned land) was from business zoned parcels that were wholly vacant at the time of the study. A further 1,262 ha (18% of the current total business zoned land) was judged to have been partially vacant, with enough room for possible further development (i.e. a portion of the site was assessed as ‘vacant potential’). This total area of existing business land includes urban area business land capacity of 2,607 ha and rural towns business land capacity of 626 ha, for a total business land capacity of 3,233 ha.

Across Auckland, the Capacity for Growth Study found that there was 716 hectares of business zoned land located on 3005 parcels that were vacant in Auckland. Vacant business land constitutes 22% of the region’s business land capacity. There was a further 1262 hectares of business zoned land that was considered to have vacant potential (39% of business land capacity) – this is from 1757 parcels that were occupied in some manner, but had a portion of the parcel that was vacant and had enough room for possible further development. Pipeline or future business land capacity (from structure plan and special areas that are due to come online before 2023) will provide an additional 1255 hectares of business land (39% of Auckland’s total business land capacity).

### **2.7 Consultation Undertaken**

See Appendix 3.39.2.

### **2.8 Decision-Making**

See Appendix 3.39.3.

### **2.9 Proposed Provisions**

The distribution and management of commercial and industrial activities have an important role in determining the shape of the urban environment. Business activity is vital to the effective and efficient functioning of the community through providing for social and economic well-being. Intervention with regard to the distribution, scale and function of business activity is critical to promote sustainable resource management and the integrated management of effects. The policy approach seeks to ensure:

- that sufficient land for differing business activities is available to provide for social and economic well-being
- an efficient urban form is achieved and productivity is maximised
- new development and commercial intensification and expansion is managed to achieve high amenity, efficiency and compact urban form.

### **2.10 Reference to other Evaluations**

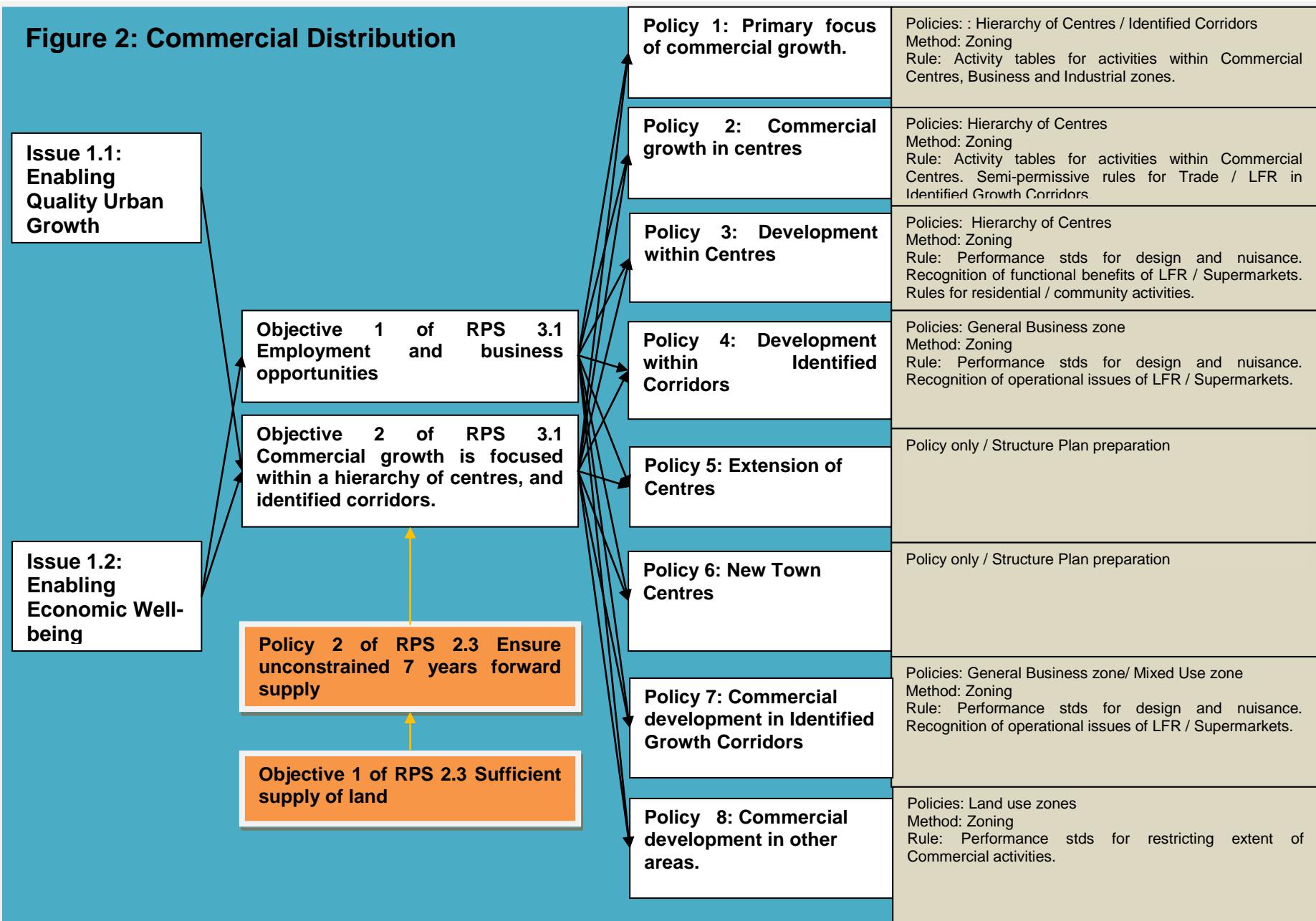
This section 32 report should be read in conjunction with the following evaluations:

- 2.1 Urban form and land supply
- 2.2 Rural urban boundary location
- 2.3 Residential zones

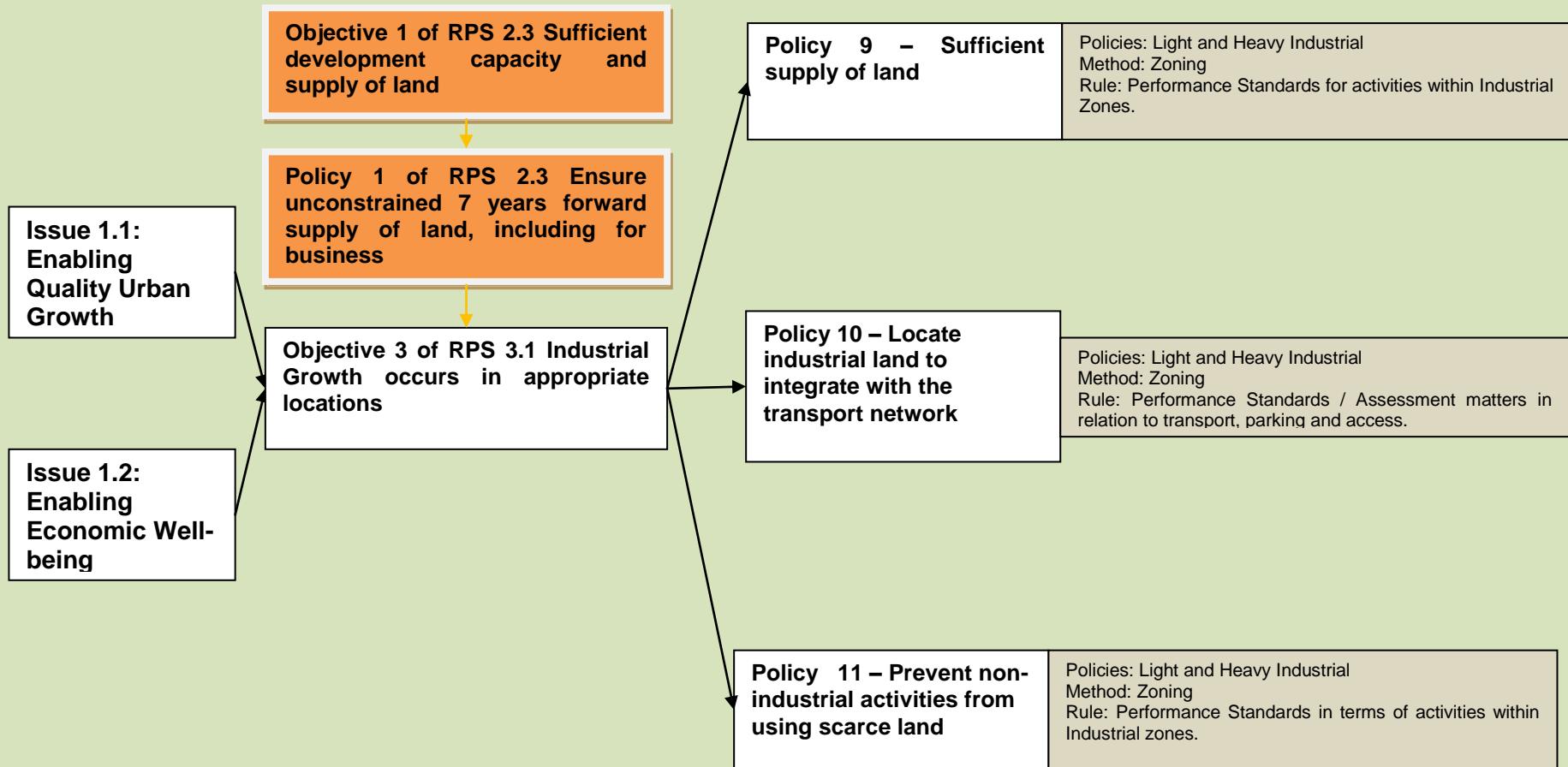
- 2.5 Building heights
- 2.6 Business building form and design
- 2.7 Design statements
- 2.8 Sustainable design
- 2.9 Accessory parking
- 2.10 Electricity Transmission Corridors
- 2.12 Pre- 1944 demolition
- 2.13 Historic heritage
- 2.14 Treaty settlements
- 2.15 Mana Whenua cultural heritage
- 2.16 Maori development
- 2.17 Maori land
- 2.18 Maori and natural resources
- 2.19 Landscapes
- 2.20 Conversion of dwellings
- 2.21 Affordable housing
- 2.22 Future Urban zone
- 2.23 Greenfield urban precincts
- 2.24 Urban stormwater
- 2.25 Freshwater
- 2.26 Flooding
- 2.27 Intermittent streams and riparian margins
- 2.28 Natural hazards
- 2.31 Earthworks
- 2.37 Schools
- 2.38 Non-accessory parking
- 2.39 Traffic in centres
- 2.40 Cycle parking
- 2.41 Strategic Transport Corridor zone
- 2.42 Crossings on arterial roads
- 2.43 Land Transport Noise
- 2.44 Air quality buffers – major roads
- 2.45 Air quality buffers – heavy industry
- 2.46 City Centre precincts
- 2.47 Signs

The following Figures 2 and 3 demonstrate the linkages between the issues and the RPS objectives and policies, and district objectives and policies.

**Figure 2: Commercial Distribution**



**Figure 3: Industrial Distribution**



## **2.11 Regional Policy Statement Objectives and Policies**

### **2.11.1 Objectives**

The following objectives are proposed:-

#### ***Objective 1 of RPS 3.1***

*Employment and business opportunities meet the current and future needs of Aucklanders.*

#### ***Objective 2 of RPS 3.1***

*Commercial growth is focussed within a hierarchy of centres and identified growth corridors that support the compact urban form.*

#### ***Objective 3 of RPS 3.1***

*Industrial growth occurs in appropriate locations that:*

- (a) promote sustainable and on-going economic development
- (b) provide for the efficient use of buildings, land and infrastructure in business areas
- (c) avoid conflicts between incompatible activities.

### **2.11.2 Policies**

The assessment in the following sections describes the policies in RPS 3.1 Commercial and industrial growth and evaluates whether they are the most appropriate for achieving the objectives, having regard to efficiency and effectiveness of the provisions. To assist with determining this, regard is also to be given to the costs and benefits associated with each provision. Due to the broad nature of some of the policy content, policies have been grouped to related objectives. Unless otherwise specified the evaluation follows a qualitative approach.

#### Commercial intensification at specific locations

Policy 1: Encourage commercial intensification to occur in the City Centre, Metropolitan and Town centres, and enabled on identified growth corridors, to provide the primary focus for Auckland's commercial growth.

#### Centre development, formation and functional amenity

Policy 2: Encourage the growth of commercial activities that serve the function, role and amenity of the City Centre, and Metropolitan and Town centres (including new centres).

Policy 3: Sustain and enhance the role and function of centres as focal points for community interaction, by ensuring development within centres positively contributes to:

- (a) an attractive, functional and efficient urban environment with a distinctive sense of place, and a quality public realm
- (b) a diversity of activities including retail, with the greatest mix and concentration of activities in the City Centre, and a distribution of compact centres that provide for the needs of Auckland and its communities
- (c) increased employment opportunities with compatible residential development
- (d) a character and form that supports or serves compact mixed use environments
- (e) the efficient use of land, buildings and infrastructure and the redevelopment of sites
- (f) economic development and business activity
- (g) high-quality street environments including pedestrian and cycle networks and facilities.

Policy 5: Provide for the outward expansion of Metropolitan and Town centres having regard to whether it:

- (a) will provide for compact mixed-use environments on the periphery of the centre

- (b) will provide for a greater level of access by a community to a wide range of facilities, goods and services in a convenient and efficient manner
- (c) facilitates the efficient and sustainable distribution of centres, in relation to the existing distribution of commercial activity and population growth
- (d) retains or enhances the existing centre's role and function
- (e) adversely impacts the role, function and viability of other centres in the hierarchy
- (f) manages the effects of commercial activity at the interface with adjoining land uses
- (g) substantially reduces the opportunity for medium to high density residential development
- (h) maintains the safety and efficiency of the road network in a way that promotes integrated transport, by providing strong connections to a range of transport modes including walking and cycling, and enabling efficient connections to the existing public transport network to link with adjoining centres and identified growth corridors.

**Policy 6:** Provide for new town and local centres within the RUB where they:

- (a) are in proximity to existing or planned medium to high density residential development
- (b) will be appropriately located in relation to the existing network of centres and population growth to achieve a sustainable distribution of centres
- (c) will provide a diverse function and role complementing the established network of centres
- (d) will avoid adverse effects, both individually and cumulatively with other centres, on the distribution, function, viability and amenity of other centres, and on existing and planned infrastructure including the road network, public transport networks and utilities infrastructure
- (e) are of a form and function which is consistent with policy 3
- (f) improve transport choices and reduce trip generation by providing strong connections to a range of transport modes including walking and cycling, and enabling efficient connections to the existing public transport network to link with adjoining centres and identified growth corridors.

#### Identified growth corridor, formation and functional amenity

**Policy 4:** Require development within identified growth corridors to primarily be of a character and form that supports or serves compact mixed use environments.

**Policy 7:** New commercial activities are, where appropriate, to be enabled on identified growth corridors:

- (a) in business and mixed use zones, having regard to:
  - i. any strategic or significant adverse effects, including cumulative effects of non-centre commercial activities on the functions and roles of the city centre, metropolitan and town centres
  - ii. community social and economic well-being and accessibility
  - iii. the efficient use and provision of land and infrastructure so that the effects of commercial development do not undermine the infrastructural capacity for other development provided for in the area
  - iv. impacts on transport efficiency, including public transport and the road network
  - v. the impacts of the development on the efficient use of any scarce industrial land, in particular opportunities for employment for land extensive industrial activities
  - vi. avoiding conflicts between incompatible activities
  - vii. the effects on residential activity.
- (b) in residential zones, having regard to:
  - i. those matters listed in (a);

- ii. the need to be of a form and scale compatible with residential character.

There is also an Identified Growth Corridor (IGC) overlay (4.5 of overlay objectives and policies). It is applied to a limited number of significant road corridors or significant segments of these corridors. The purpose of the overlay is to provide additional opportunity to those commercial activities (predominantly retail activities) that:

- may not be appropriate for, or are not able to locate in centres; and
- are not typically provided for in the underlying zone.

Where commercial activities are enabled by an identified growth corridor, these should:

- respect the current land uses and the underlying zone's anticipated environmental results;
- support a compact urban form;
- maintain the safety and efficiency of the road network and promote integrated transport;
- not diminish the function and viability of the city centre, metropolitan, town and local centres.

The overlay only relates to those sites which have direct frontage or the predominant public access from the identified growth corridor. The overlay is a policy overlay. It does not change the activity status of land use activities within the overlay area. Its objectives and policies are as follows:

#### **Objectives**

1. *Provide for a mix of compatible commercial activities that may not be appropriate for, or are not able to locate in centres, to enable people and communities to meet their social and economic needs.*
2. *Improve the amenity and street environment and the integration with the transport network.*
3. *Enable a range of commercial activities which respects existing development and achieves the anticipated environmental results for the underlying zone.*

#### **Policies**

1. *Apply the overlay only to those sites which have direct frontage to the identified growth corridor.*
2. *Enablement of commercial activities on an identified growth corridor is assessed according to the provisions of policy 8 of 3.1 RPS . (non-centre location Policy 8)*

An IGC policy overlay provides for greater certainty and commercial provision where applied to a road corridor. This is necessary to reflect the actual land use, when the current provisions do not adequately recognise the underlying land use activities, and to provide for additional commercial opportunity where there are supply shortages.

At present in Auckland, there is approximately 2.5 million m<sup>2</sup> of retail floor space within centres. There is an additional 1.4 million m<sup>2</sup> of retail floor space outside centres, within the proposed Mixed Use, General Business, Heavy and Light Industry and other zones. Further work is underway to determine the capacity available for retail floor space within the proposed Unitary Plan zones, as the zoning patterns and extents are finalised.

IGCs are important for accommodating additional commercial provision, and due to their function in terms of the transport hierarchy, and urban form and efficiency. Providing a large number of IGCs could degrade transport function and land use integration, and the effectiveness of a centres plus approach to commercial land use management. Given the uncertainty as to existing supply and future demand, and that only Lincoln Road really exhibits a considerable comprehensive retail focus, there is a risk if additional IGCs are provided prior to the supply information is confirmed and the effects of additional IGCs on centres viability are better understood.

Additional locations can be included in the IGC overlay should these merit inclusion in future. Such an approach is considered to be appropriate in terms of achieving the objectives (including the transport objectives) and the purpose of the Act.

#### Non-centre Locations

Policy 8: Where appropriate, commercial activities are to be enabled in business and Mixed Use zones in locations other than the city centre, metropolitan and town centres and identified growth corridors, in particular in neighbourhood and local centres and those major transport corridors not identified as growth corridors, having regard to:

- (a) the matters listed in policy 7
- (b) the extent to which activities would compromise the achievement of policies 1 and 2
- (c) the extent to which the hierarchy of locations identified in policies 1 – 7 above may be compromised.

#### Industrial Land Allocation and Use

Policy 9: Enable sufficient supply of land for industrial activities, particularly land-extensive industrial activities, where the scale and intensity of effects anticipated in those zones can be accommodated and managed.

Policy 10: Locate industrial land where it is relatively flat, and quick and efficient access to freight routes, rail or freight hubs, ports and airports.

Policy 11: Provide for the efficient use of scarce industrial land and avoid incompatible activities by:

- (a) limiting the scale and type of non-industrial activities on land zoned for light industry
- (b) preventing non-industrial activities establishing on land zoned for heavy industry.

#### **2.11.3 Methods**

- (i). Rules and activity tables for activities which maintain and protect the character, amenity and functioning of the centres zones, and Mixed Use and General Business zones (identified growth corridors)
- (ii). Assessment criteria
- (iii). Area plans, centre plans, precinct plans
- (iv). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### **2.11.4 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed objectives and policies. The approach to centres and the distribution of retail activity is largely consistent with the recently finalised Change 6 to the operative Auckland Council RPS.
- The evidence base and supporting information enable informed and transparent decision making. This includes assessment of demand and supply of industrial land; evidence prepared for Change 6 to the ACRPS in relation to retail demand and distribution; population and employment projections and locational assessment; technical investigations prepared for the Auckland Plan on Centres and Corridors; and the Retail Economic Assessment prepared by Auckland Council's Research, Investigations and Monitoring Unit (RIMU). Monitoring and investigations of capacity and demand are ongoing, for business land and floor-space, and include vertical (storeys) as well as horizontal space.
- Information on land supply for business, and particularly industrial, activity in the Future Urban zone and within the RUB is not yet sufficient for certainty as the analysis of the future land supply has concentrated on residential land needs.

However, the short term needs are understood, and the structure planning process and business objectives and policies require consideration of the supply of new business land.

- In relation to identified growth corridors there is only limited understanding of large format retail distributional effects on centres. There is an evidence base for the physical distribution pattern of large format retail outside centres, and investigation underway to determine the supply-demand role of growth corridors. A precautionary approach is taken in applying the IGC overlay, currently only to Lincoln Road where a predominant large format retail character is emerging along parts of the corridor.

## **2.12 Alternatives**

Alternatives are:

1. Preferred alternative
2. Status quo
3. A liberal approach

The proposed preferred alternative is discussed in 2.9 above. The status quo alternative is outlined in 2.5 above.

### **Alternative Three – A liberal approach.**

This approach would enable business activity to establish in any business zone within Auckland, at any scale, provided adverse effects on the immediate environment are not significant. The market would then need to address matters of infrastructure, and social well-being.

Such an approach would not recognise and provide for the efficient use and agglomeration of industrial activities, all with a similar form and character and the ability to internalise their effects without causing nuisance to more sensitive activities. Accordingly, such an approach would provide for a disjointed range of activities without providing any strategic overview as to the efficient provision and integration of infrastructure, as well as avoiding reverse sensitivity effects between activities. Accordingly, the health and safety of the community would not be provided for, neither would adverse effects be avoided, remedied or mitigated.

The approach would also foster a wide range of non-industrial activities within industrial and other business zones, leading to a potential increase in land values, and the potential for significant distributional effects on existing commercial centres. At a certain point the price of land may well make it difficult for industrial activities to compete and locate in traditional industrial zones. Auckland Council would need to find alternative locations for industrial purposes, with associated costs to the community in funding unanticipated network infrastructure and requiring mitigation of any environmental effects associated with locating new industrial zones in sub-optimal locations. Accordingly, such an approach would not achieve the reasonably foreseeable needs of people and communities in terms of providing for their well-being.

Table 1 below discusses each alternative compared to the preferred alternative.

**Table 1**

	<b>Preferred Alternative</b>	<b>Status Quo Alternative 2</b>	<b>Alternative 3 Liberal approach to business distribution</b>
Appropriateness	<p><b>Objective 1 of RPS 3.1</b>  <i>Employment and business opportunities meet the current and future needs of Aucklanders</i>  This objective ensures that land and opportunities for development will be available to support economic growth and employment.</p> <p>This approach gives effect to the purposes and principles contained in Part 2 of the Act.</p> <p>In relation to Section 5 of the Act, the objective promotes the sustainable development of natural and physical resources as these relate to business opportunities through seeking to ensure that the use and development of resources occurs in a way, or at a rate that provides for the ongoing economic well-being of Aucklanders. Accordingly, the objective is anticipated to result in enabling economic well-being within Auckland. The purpose of the objective is to recognise the provision of enduring business and employment opportunities that are integral to the distribution and role of business activity in the region, which leads to identifying the different types of business environment for such activities.</p> <p>Social well-being is not explicitly identified in the objective, although there are implications of the consequential impacts on community and social well-being, as well as health and safety.</p> <p>Economic well-being is a driving principle behind this objective, and the reference to '<i>current and future needs</i>' identifies the requirement to provide for the ability for business activities to meet both current employment and business expectations as well as provide for the need for the economic enablement of future generations.</p> <p>The objective does not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems, nor reference the need to avoid, remedy or mitigate adverse effects, rather these aspects are the subject of such objectives within the Transport and Natural Resources sections.</p> <p>The objective is also considered in accordance with the following principles of the Act:</p> <ul style="list-style-type: none"> <li>S7(b) in that the objective seeks to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources.</li> <li>S7(g) in that the objective provides recognition of issues associated with provision of employment and business opportunities with regard to the finite characteristics of the physical resources that provide for the existing business environments of the region.</li> </ul> <p>The objective is useful in that it recognises that there will be considerable amounts of additional land and physical resources required to accommodate the likely growth in employment and business opportunities necessary to provide for a total population in excess of 2 million by 2041, and the commensurate increases in market and employment demand as a consequence. The approach signals that regardless of the evolution of markets, industrial business sector formation or existing capacity constraints, the regional policy direction is to seek to provide for ongoing opportunities to meet demand. These are also subject to other regional tier policies as these relate to urban form and natural resources.</p> <p>Capacity to grow business in its widest sense plays a significant role in the growth of the region and in providing jobs and thus economic spending power, which includes retail spend. However land capacity is not mutually exclusive between industrial and retail land take up, as in many instances the development of available industrial land for retail purposes, has a consequential impact on Auckland's ability to promote growth. The ability to constrain the extent of retailing in industrial zones is important in addressing a present inefficient supply of industrial land resource. To fulfil the objective suitable commercial opportunities will need to be provided within the statutory life of the Unitary Plan.</p> <p>Accordingly, to be achievable the Unitary Plan will need to ensure that there is a sufficiently flexible approach to provide for the peaks and troughs of market demand, without having to specifically anticipate and provide through zoning for the extent of future market changes. However, the approach does need to provide suitable opportunities for growth to be provided for in a manner, and at a rate, that provides for ongoing economic growth.</p>	<p>The approach is similar to the preferred alternative, continuing with the approach and objectives, policies and rules of the operative Auckland Council RPS and Regional and District Plans.</p> <p>In economic and business terms those plans represent a RPS approach similar to that of the proposed preferred alternative, and in particular for retail distribution with the relatively recent finalisation of Change 6 to the Auckland Council RPS. The differences between the status quo operative plans and the preferred alternative are mainly in the Unitary Plan proposed longer overall timeframes for land supply, increased physical scale of buildings for business activity, increased attention to the quality of the resultant built environment, and greater consistency of approach across the Auckland region. The operative sections of the Auckland Council District Plan (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Isthmus, Auckland City Central Area) are all in varying stages of giving effect to the RPS.</p> <p>This approach could potentially achieve the objectives over a longer timeframe and has been shown to meet the requirements of the RMA.</p>	<p>A liberal approach to dispersal is not considered to be as appropriate as retaining some 'compression' on the spatial location of retail activity. This is necessary as the market sometimes fails to consider significant community-wide economic benefits achieved through the location of retail activity, or the disbenefits to industrial land integrity. A liberal approach if left unchecked is likely to result in an inefficient use of resources, including loss of future potential efficiencies which would otherwise be associated with a compact urban form.</p> <p>The wider consideration of activity and vibrancy as a competitive advantage for commercial centres should be considered outside a narrower determination of trade competition (which must be disregarded). The value to patrons of commercial centres is not determined by just their decisions, but also those of shoppers that do not consider this loss in their decision making. Effectively by dispersing retail activity the value of vibrant centres is reduced, and the level of function and visual amenity decreased. There is regulatory value in terms of a consideration as to whether such effects would be significant.</p> <p>The approach would not be appropriate in terms of the industrial land resource through the uptake of scarce resources for non-industrial activities and increasing land values.</p>

<p>The approach cannot be overly restrictive, in that subject to other regional tier criteria, opportunities should be provided. Zoning to specifically provide for current anticipated levels of demand, in combination with a flexible policy approach would be key determinants in the success of the objective.</p> <p><b>Objective 2 of RPS 3.1</b></p> <p><i>Commercial growth is focussed within a hierarchy of centres and identified growth corridors that support the compact urban form.</i></p> <p>This approach gives effect to the purposes and principles contained in Part 2 of the Act.</p> <p>In relation to Section 5 of the RMA, the objective promotes the explicit sustainable development of physical resources as these relate to the agglomerated resources within the hierarchy of commercial centres and identified growth corridors.</p> <p>The objective is anticipated to result in enabling economic well-being within Auckland through acknowledging the agglomeration benefits associated with reinforcing commercial centre role and function. Commercial centres represent considerable investment in land and buildings under both public and private ownership. Roads and service infrastructure is provided to a high standard, which then provides the ability for land owners to optimise the efficient use of such infrastructure. This is important in achieving an efficient and effective centres network, which remains vibrant and provides for the economic and social well-being of the immediate or supported community.</p> <p>The physical resources represented by the existing commercial centres, and to a lesser extent identified growth corridors, are identified as being of value in terms of providing the primary role and function in meeting the commercial needs of the community. The emphasis on '<i>focused</i>' '<i>commercial growth</i>' in these areas will ensure that these resources can be relied on to meet the reasonably foreseeable needs of the community and future generations.</p> <p>The approach recognises that the features and characteristics that contribute to Auckland's distinctive form include the city centre and commercial centres, particularly metropolitan and town centres, as prominent focal points. The objective recognises the need for these areas to continue to provide a physical focus and identity for communities and business activities and accommodate growth.</p> <p>The manner in which Auckland grows will affect how efficiently services are provided and energy consumed. Intensification of commercial activity in these centres, in combination with higher residential density opportunities around these focal points, helps to sustain the hierarchy of centres as important physical resources for the surrounding community. This is a definitive component of the compact urban form as expressed in <b>Objective 1 of RPS 2.1</b>.</p> <p>The objective does not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems. Rather this aspect relies on the other objectives contained within the UP at the regional level. In a similar manner the objective does not reference the need to avoid, remedy or mitigate adverse effects.</p> <p>The objective is also considered in accordance with the following principles of the Act:</p> <ul style="list-style-type: none"> <li>S7(b) in that the objective seeks to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources associated with the commercial centres and identified growth corridors.</li> <li>S7(g) as the objective recognises the finite characteristics of physical resources associated with the commercial centres and to a lesser extent identified growth corridors.</li> </ul> <p>The objective is useful and reasonable in that in recognising and providing for the efficient use and development of existing physical resources represented by the network of centres, further intensive development within centres can: support a greater range of local services, facilities and employment and increase the opportunity for safe walking and cycling; increase agglomeration benefits; and also help support passenger transport by bringing residents, employees and visitors closer to transport routes</p> <p>Equally the approach also recognises that there are capacity issues for existing centres within the region, and the ability to accommodate commercial demand to 2026 and further. Such capacity constraints raise issues associated with the opportunity costs of attempting to accommodate all types of business activities in-centre (i.e. reduction in fine-grain residential and commercial activities in centre, design issues). Accordingly a 'centres plus'</p>		
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	<p>rationale as derived from the Auckland Plan is justified as it can provide adequate opportunity to accommodate such demand by expanding existing centres and allowing additional business opportunities outside centres.</p> <p>Accordingly, to be achievable the Unitary Plan will need to ensure that there is sufficient capacity within commercial centres and identified growth corridors to not only incorporate fluctuations in demand (both existing and foreseeable demand), but also recognise and provide for retail types and formats that are inherently unsuited or incapable of locating within such environments. Accordingly, the use of the phrase '<i>focused</i>' in this context is important in acknowledging that whilst there is some primacy in directing commercial activity to centres and limited identified growth corridors, other out of centre locations could be appropriate, as subject to criteria that would ensure that the type and extent would not contravene support of a compact urban form.</p> <p><b>Objective 3 of RPS 3.1</b></p> <p><i>Industrial growth occurs in appropriate locations that:</i></p> <ul style="list-style-type: none"> <li>(a) promote sustainable and on-going economic development</li> <li>(b) provide for the efficient use of buildings, land and infrastructure in business areas</li> <li>(c) avoid conflicts between incompatible activities.</li> </ul> <p>The objective provides for managing certain health and safety effects, principally through recognising that activities locating within industrial zones will generate a range of amenity, traffic and nuisance effects and pressures which may not be benign. The objective implicitly acknowledges that the location of industrial activities should be managed to ensure: reverse sensitivity and interface issues with more sensitive activities are reduced; that thresholds associated with public health are applied; the character of industrial environments should be appropriately recognised; and lastly for such physical resources represented by industrial activities to be sustainably managed and strategically integrated with supporting infrastructure.</p> <p>This objective is consistent with the purpose and principles of the RMA. This objective seeks to sustainably manage the industrial land resource for industrial activities, and hence reduce incompatible activities within these areas, or the premature uptake of this physical land resource by non-industrial activities and hence better meet the reasonably foreseeable needs of future generations. This objective also seeks to manage reverse sensitivity effects of different activities, and therefore provide for the community's social and economic well-being.</p> <p>The objective is also considered to be in accordance with the following principles of the Act:</p> <ul style="list-style-type: none"> <li>S7(b) in that the objective seeks to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources associated with Auckland industrial zones.</li> <li>S7(c) and s7(f) in that the objective recognises that the amenity generated by industrial activities, and the qualities within industrial zones may not be appropriate for more sensitive activities.</li> <li>S7(g) as the objective implicitly recognises the finite characteristics of physical resources able to accommodate growth of industrial activities.</li> </ul> <p>The objective does not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems. Rather this aspect relies on the other objectives at the regional level. In a similar manner the objective does not reference the need to avoid, remedy or mitigate adverse effects.</p> <p>The objective is useful and reasonable in that it recognises that industrial growth is to occur subject to being appropriately located. Group 1 activities in the Auckland region, being manufacturing construction, wholesale trade, transport &amp; storage and some utilities, are crucial in terms of direct production and employment gains, as well as the indirect support of ancillary support services. Also, industrial activity in the region accounted for some 35% of regional employment (2011), with an expected employment count growth of some 72,800 employees by 2041.</p> <p>The Auckland region continues to face pressures from population growth, and with this the demand for land resources, including business land. In order for Auckland to grow into an internationally competitive city, it needs to function in an integrated manner. The provision of an appropriate volume of industrial land, strategic integration with infrastructure, and the avoidance of the uptake of industrial land from incompatible or speculative activities (such as retail, housing or office activities) is key to a competitive, export-focused economy as well as providing jobs for a third of its workforce.</p> <p><i>'Appropriate'</i> in relation to the location of industrial growth refers to locations that provide the lowest cost</p>	
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	<p>(including opportunity costs) relative to their benefits (i.e. highest net social benefit). It is a key criterion in assessing suitable and existing locations with regard to industrial activity.</p> <p>Accordingly, to be achievable the Unitary Plan will need to ensure that there is sufficient capacity to accommodate industrial land demands, and that uses which may reduce the efficiency and competitiveness of industrial land are reduced. Industrial activity typically requires:</p> <ul style="list-style-type: none"> <li>• Large land parcels</li> <li>• Vacant land</li> <li>• Good access to motorways and arterial roads</li> <li>• Relatively cheap land</li> <li>• Distance from sensitive activities; and</li> <li>• Consistent energy supply.</li> </ul>		
Effectiveness	<p><b>Policies in RPS 3.1 Commercial and industrial growth</b></p> <p><b>Commercial intensification at specific locations</b></p> <p>Having regard to their efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that Policy 1 and the associated methods are the most appropriate to achieving objectives 1-3 of RPS 3.1.</p> <p><b>Centre development, formation and functional amenity</b></p> <p>Having regard to their efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that policies 5 and 6 and the associated methods are the most appropriate to achieving objectives 1-2 of RPS 3.1.</p> <p><b>Identified growth corridor, formation and functional amenity</b></p> <p>Having regard to their efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that Policy 4 and 7 as well as their associated methods are the most appropriate to achieving objectives 1-2 of RPS 3.1. Such an approach identifies that not all retail investment should take place in commercial centres, as issues of convenience, choice, sustainable infrastructure utilisation and local identity become increasingly important for different forms of retail activity.</p> <p><b>Non-centre locations</b></p> <p>Having regard to their efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that Policy 8 (and its reliance on the criteria in Policy 7) as well as the associated methods are the most appropriate to reconciling and achieving both objectives 1-2 of RPS 3.1.</p> <p><b>Industrial land allocation and use</b></p> <p>Having regard to their efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that policies 9, 10 and 11 as well as their associated methods are the most appropriate to achieve Objective 1 of RPS 3.1.</p>	<p>The approach is similar to the preferred alternative, continuing with the approach and objectives, policies and rules of the operative Auckland Council RPS and Regional and District Plans.</p> <p>In economic and business terms those plans represent a RPS approach similar to that of the proposed preferred alternative, and in particular for retail distribution with the relatively recent finalisation of Change 6 to the Auckland Council RPS.</p> <p>The policies and their methods (and rules) can be implemented at some material cost, principally in terms of administrative costs associated with consenting in non-centre/corridor locations. However, the benefits of a</p>	<p>The absence of provisions as to the distribution of activities at this level would not help achieve the purpose of the RMA as there would be complete reliance on either the market, or on other provisions of the Plan, which are less enabling and more targeted at managing specific adverse effects. The social, economic and environmental costs of having such a Policy approach include: limited guidance to business for investment confidence, and a potential loss of development options and associated employment. There are costs to the council in terms having to react to incremental business developments and the associated provision of servicing infrastructure. There would be an overall proportionate decrease in productivity and competitiveness in Auckland.</p>

	<p>Provision is made within the residential and rural zones to enable limited scale, generally home based employment opportunities and produce stalls.</p> <p><b>Centre development, formation and functional amenity</b></p> <p>Enabling a large scale and diversity of development, but with improved design was a key message from the Auckland Plan.</p> <p>Encouraging redevelopment and the consolidation of the physical resources associated with commercial centres provides for the efficient utilisation of community, transport and physical resource infrastructure. Managing an appropriate scale of development and reinforcing the role and function of centres within the existing pattern and scale of development assist in achieving a compact urban form.</p> <p>This approach, in conjunction with improvements to urban design parameters within specific design and precinct overlays provides the most appropriate means by which to implement Objective 2 of RPS 3.1, albeit that there needs to be recognition in the respective assessment matters for in-centre design of the function and operational characteristics and viability enhancements that differing commercial typologies bring to centres (refer Policy 8 of zone objectives and policies 3.3 and Policy 6 of zone objectives and policies 3.3)</p> <p>Given the identified capacity issues associated with the supply of commercial land in the region, positive policy provisions as to 'expanding centres' (Policy 5 of RPS 3.1) and 'new centres' (Policy 6 of RPS 3.1) are appropriate in terms of achieving objectives 1-2 of RPS 3.1.</p> <p><b>Identified growth corridor, formation and functional amenity</b></p> <p>Encouraging consolidation of activity within commercial centres remains the primary focus in terms of achieving a compact urban form. There is also recognition that there are:</p> <ul style="list-style-type: none"> <li>→ capacity issues associated with a number of centres and ability to accommodate growth to 2041; and</li> <li>→ opportunity costs associated with larger trade supply retailers if required to locate in centre locations where they offer little in functional amenity, but would occur at the expense of finer grain social and community enablement.</li> </ul> <p>Specific commercial intensification is enabled in identified growth corridors as a secondary preference to centre consolidation, acknowledging that such locations are typically accessible by limited transport modal choice, and increase trip lengths and journey numbers. However, in recognition that not all retailing formats are suitable for, or can be located within, commercial centres, such locations could be available without compromising the attainment of a compact urban form, where the specific criteria in Policy 7 of RPS 3.1 are considered.</p> <p>This approach, in conjunction with discretion as to the type, design and transport integration with its receiving environment in an identified growth corridor, provides the most appropriate means by which to implement and reconcile objectives 1-2 of RPS 3.1.</p> <p><b>Non-centre locations</b></p> <p>Encouraging consolidation of activity within commercial centres represents the primary focus in terms of achieving a compact urban form. However, it is recognised that there is a range of commercial activities which due to their convenience nature, ability to service a localised residential or employment catchment, or accessory link to a primary activity on a site, have little or no distributional or strategic adverse effects on a compact urban form. They can also provide for social gains and reduced trip generation.</p> <p>This approach, in conjunction with discretion as to the type of commercial activity, its design and transport integration with its receiving environment in 'other' areas, provides the most appropriate means by which to implement and reconcile objectives 1-2 of RPS 3.1.</p> <p><b>Industrial land allocation and use</b></p> <p>The policy and methods are effective, given that they seek to encourage a broad range of compatible activities within Auckland through two types of industrial zones that would cater for demand in industrial land provision and the attainment of objective 3 of RPS 3.1.</p> <p>Policy 9 of RPS 3.1 and its associated methods, including zoning, the RUB and land release, and the air quality overlays, would be effective in the achievement of '<i>industrial growth occurring in appropriate locations</i>' through land supply, protection of the industrial land resource, and avoiding conflict between incompatible activities.</p>	<p>proactive stance on economic and business development through primarily directing commercial, recreational and social activity into consolidated commercial centres are significant and range from individual money saving, through to a more integrated approach for the development of infrastructure and broader integration with urban form.</p> <p>There is sufficient flexibility within the broad range of provisions so as to not exclude development opportunities outside of commercial centres and identified growth corridors, of which there are few currently identified. This is essential where specific types of commercial activity are unable, or is inherently unsuited to locate within such centres and corridors, and yet such development would benefit social and economic well-being.</p>	
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	<p>Policy 11 and its associated methods would be effective in reducing the range and extent of non-industrial activities locating in industrial zones, and thereby assist in the achievement of '<i>industrial growth occurring in appropriate locations</i>' through reducing the depletion of such locations to non-industrial uses.</p> <p>Lastly, Policy 10 and its associated methods, principally zoning, recognises the locational characteristics of integrating industrial land resources with the transport network, including port and air freight activities.</p>		
Efficiency	<p><b>Commercial intensification at specific locations</b></p> <p>The policy and associated methods and rules are effective, given that they seek to direct commercial activity into commercial centres ('encourage'), and to a lesser degree identified growth corridors ('enable'). The approach is to better enable and consolidate social and economic well-being and the associated support of transport mode choice and the improved efficiency of infrastructure. It is not definitive in requiring that all commercial activities be established in these locations.</p> <p>The provisions require a proactive stance from the council to identify and provide for sufficient capacity, particularly to accommodate centre growth for commercial development, and to ensure that associated regulatory hurdles are reduced. Examples include integrated transport assessments (see S32 Traffic in centres) and recognition of the typologies of commercial activity in terms of design requirements (objectives in 3.3 and 3.4 in zone objectives and policies).</p> <p>Intensifying commercial activity in centres in conjunction with social, community and business activities, together with residential intensification opportunities within and surrounding centres, attains considerable sustainability benefits. Such an approach both improves the function and role of centres as focal points for a wider residential community, but also improves the liveability of the region as a whole, and provides for the strategic integration with supporting infrastructure. Such an approach is a key mechanism in achieving a compact urban form.</p> <p><b>Centre development, formation and functional amenity</b></p> <p>The provisions identify the basis by which functional and visual amenity and character can be maintained within commercial centres through directing or consolidating a diverse range of activities so as to better enable social and economic well-being in close proximity to areas of residential intensification. Such an approach also provides certainty and long term investment in the physical resources represented within centres.</p> <p>Specific design and precinct overlays provide design responses as to verandahs, shop frontage display windows and activation, and the use of materials. These requirements reflect the specific outcomes sought for areas which consist of the highest concentration of public / private interface within commercial centres, and in turn require a higher quality design response. However, these provisions will only be efficient where they do not come at the expense of increased functional amenity within centres through reducing the range of activities likely to be able to attain such a standard.</p> <p>The provisions also require a proactive stance from the council to work in association with the community and private business providers so as to contribute to the overall amenity of the commercial centres through investment in the public realm and transport networks, as matched with investment from the private sector, or community facility providers.</p> <p><b>Identified growth corridor, formation and functional amenity</b></p> <p>In terms of a comparison of the benefits and costs, it is considered that the policies and methods are the most efficient in terms of achieving objectives 1-2 of RPS 3.1, in that the approach of providing for typologies of commercial activity within identified growth corridors, as subject to criteria in relation to urban form, amenity and transport integration achieves the objective's environmental aims, as well as dealing with the 'Issues' of ensuring quality urban growth and economic enablement.</p> <p>The provisions recognise that there are capacity issues for existing centres within the region, to accommodate commercial demand to 2041. Such capacity is also an opportunity cost of accommodating all types of business activities in-centre (i.e. reduction in finer grain residential and commercial activities in centre). Accordingly, the provisions are efficient in that a 'centres plus' rationale is justified as it is considered that there is capacity within centres and also outside centres, in the form of identified growth corridors, and General Business, Business Park and Mixed Use zones to provide adequate opportunity for meeting such demand.</p> <p>The provisions also identify requirements for commensurate improvements in amenity and design which appear appropriate in terms of the overall net benefits to the community.</p>	<p>Although Change 6 to the operative Auckland Council RPS has an approach largely adopted for the preferred alternative, the district plan sections do not have consistent approaches and vary in the extent to which they give effect to the RPS. There would be significant efficiency gains if a consistent approach were taken across all of the district plan section areas (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Isthmus, Auckland City Central Area).</p> <p>Further Plan Changes would be expected to occur, further giving effect to the RPS and also responding to monitored take-up of land for different types of business activity.</p> <p>Industrial land is not strongly protected for industrial activities, and much of the zoned industrial land is taken up by other land uses, leading to a constantly diminishing supply of land for this type of employment and business.</p>	<p>Not providing some restrictions to the distribution and effects of business activity, does not reflect the significance of commercial centres as a physical resource to be sustainably managed, nor the scarcity of the industrial land resource. While not always noticeable at first, the long term costs to the community of dispersed retail and office activity can be significant, including limiting the range of activities and facilities available by way of single vehicle trips, reductions in social interaction, and poor transport network integration with commercial land use</p> <p>In this instance, the social and economic costs to the community and environment of business dispersal, far outweigh the localised benefits of improved choice or the market decisions of new entrants.</p>

	<p>The provisions also require a proactive stance from the council to consider and plan for infrastructure improvements, particularly in transport, to accommodate changing patterns of commercial activity in these environments.</p> <p><b>Non-centre locations</b></p> <p>In terms of a comparison of the benefits and costs, it is considered that the policies and methods are the most efficient in terms of achieving objectives 1-2 of RPS 3.1. The approach of providing for typologies of commercial activity within 'other areas', where these fulfil a largely convenience role, and as subject to criteria in relation to urban form, amenity and transport integration is seen as achieving the purpose of the Act in an efficient manner.</p> <p>The provisions recognise that there is little to be gained in terms of a conservative approach to the management of the distribution of small scale centres, convenience commercial activities, home-based employment and rural produce stores. Subject to localised amenity standards, a more efficient strategic approach is to be fully enabling of such activities, subject to specific criteria to manage the scale, function and typology of such activities where these would otherwise give rise to strategic effects, or significant localised effects.</p> <p><b>Industrial land allocation and use</b></p> <p>In terms of the capacity aspects of Policy 9, this policy and its methods can be implemented for a relatively minor cost, in the Auckland context. These are primarily associated with the provision of additional industrial land, given that servicing costs are an anticipated cost for all development.</p> <p>The benefits of a proactive stance on the provision for a wide range of industrial activities are significant and range from the ability to plan for and efficiently use servicing infrastructure, to increasing the range and diversity of employment options Auckland-wide.</p> <p>In terms of the nuisance, amenity and design aspects of policies 9 and 11 and their methods, the policies and methods can be implemented for a moderate cost. There is an obligation applied to industrial business owners to improve the amenity and aesthetic of industrial areas. This needs to be tempered by recognition that these remain 'working environments' and that aesthetic context remains appropriate. However, new industrial land developments are typically of a higher amenity standard than more historical manufacturing and construction activities, so the application of higher amenity standards along public interfaces is not seen as excessive or unnecessary. The benefits are an improved streetscape as outlined in the outcomes sought by the Auckland Plan.</p> <p>Lastly, in terms of Policy 10, it and its methods can be implemented for a minor cost to business owners, provided that there is capacity provided within the network of commercial centres and identified growth corridors to accommodate such activities. The benefits to the wider community in terms of increasing economic competitiveness and employment opportunities are substantial.</p>		
Costs	<p><b>Commercial intensification at specific locations</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> Slight reduction in choice for the provision of retailing and office activities in a wide variety of locations, which may have provided improved accessibility to a limited number of nearby consumers. Issues of congestion where associated with under-provision of commercial opportunities.</p> <p><i>To the council:</i> Can lead to congestion and capacity issues associated with social and transport infrastructure.</p> <p><i>To business owners:</i> may frustrate new entrants that may not be easily accommodated in commercial centres or identified growth corridors.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Increased costs in goods and services provision, reduction in opportunities where associated with under-provision of commercial opportunities.</p> <p><i>To the council:</i> Administration costs associated with the extent of applications.</p> <p><i>To business owners:</i> Increase in property development costs within the commercial centres and to a lesser extent identified growth corridors.</p> <p>-Reduction in complete flexibility to facilitate the development of commercial, recreational and social infrastructure out-of-centre which is most likely to reduce certainty for existing out-of-centre developments.</p> <p><b>Environment:</b> Potential increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as activities consolidate, if not well-managed.</p>	<p>Costs similar to those of preferred alternatives, with the additional costs of infrastructure and development where different areas of Auckland have differing district plan provisions.</p> <p><b>Industrial Costs</b></p> <p>Reduced employment through lack of land availability.</p> <p>Reduction in opportunities for individual site development.</p>	<p>By not providing a statutory platform encouraging the consolidation and diversity of activities within commercial centres, there would result:</p> <ul style="list-style-type: none"> <li>→ incremental inefficiencies for roading, public transport initiatives and infrastructure which will over time increase costs to the community, and disenable people and communities from providing for their social and economic well-being, especially the less mobile;</li> <li>→ a decrease in amenity and design values, leading to pressure on the Council to undertake centre amenity projects; and</li> <li>→ reduced functional amenity in-centre, and a loss of social and economic well-being for adjoining communities.</li> </ul>

	<p><b>Centre development, formation and functional amenity</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> May be some (limited) loss of functional amenity in closest shopping centre, which may be impacted (not to a significant or substantial extent) by accepted changing patterns of commercial distribution through the establishment of new centres (Policy 6).</p> <p>-Some loss of housing intensification options, or impacts from altered business / residential interface where centres expand (Policy 5 specifically focused on centre expansion).</p> <p><i>To the council:</i> May over time give rise to pressure on Mixed Use and Light Industry zones in particular through allowing some types of commercial activity to establish in these locations. This is likely to necessitate rezoning of additional industrial land due to increased incompatibilities between employment types / replace limited losses of scarce industrial land resource.</p> <p><i>To business owners:</i> Centre provisions need to be flexible enough to accommodate changing societal tastes and retail formats that may emerge in future. This requires resilience in built form and design.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Where there are capacity constraints in the ability to accommodate in-centre activity (where Policy 6 'expansion' is not applied by way of Plan and zoning change) economic growth established within a catchment will be diverted to support a distant centre or more dispersed commercial pattern.</p> <p><i>To the council:</i> Administration costs associated with the extent of assessment required for applications.</p> <p><i>To business owners:</i> Compliance costs, specifically where discretion is limited but outcomes sought by council through discretion remain uncertain / ambiguous.</p> <p>-Reduced level of certainty for those who have invested in retail activity beyond existing centres, also economic uncertainty where 'opportunities' for non-centre retail typologies are overly constrained in those zones in terms of design responses sought.</p> <p>-Reduced opportunity for in-centre locations hence increases in rent.</p> <p><b>Environment:</b> Increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as activities consolidate, also some shopping trips require the use of private vehicles.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p>	<p>Fewer multiple trips, hence increased trips and journey length on the network.</p> <p>Larger commercial outlets enabled in out of centre locations have greatest potential to diminish the wider movement network.</p> <p>Increased reverse sensitivity effects from incompatible activities locating within industrial zones.</p> <p>Uncertainty in relation to investment decisions, especially for incumbents.</p> <p>Costs associated with the lack of ability to cohesively plan infrastructure around the type of business activity that will establish in any business zone.</p>
	<p><b>Identified growth corridor, formation and functional amenity</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> Opportunity and agglomeration social costs where particular typologies that could otherwise establish in centre prefer identified growth corridor options, although this is reduced where there are capacity / functional limitations to accommodate in-centre activity.</p> <p>-Limited reduction in finer grain Corridor development and ability to future-proof for a diversity of activities.</p> <p>-Elongated form makes it difficult to define a community and sense of place.</p> <p>-Over-abundance of flexibility of business location and operation may reduce the functioning of commercial centres as focal points for community activity. Reduced choice for the less mobile.</p> <p><i>To the council:</i> May over time give rise to pressure on the duplication of social and community facilities and public transport routes / frequencies where customer travel patterns become dispersed as a consequence of marked changes in commercial distribution.</p> <p><i>To business owners:</i> Increased costs in design and resilience in built form and design for identified growth corridor development.</p> <p>-Some risks to incompatible incumbent activities, due to resultant public reverse sensitivity issues.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Can decrease extent of employment opportunities where intensive industrial activities are replaced by less employee-intensive retail outlets.</p> <p><i>To the council:</i> Costs associated with uncertainty as to the extent of infrastructure around the diversity of business activity that may occur in a more dispersed commercial approach. Some business activity requires significant road infrastructure (e.g. supermarkets); other business activity relies heavily on wastewater discharge –a large spectrum of business activity in Corridors can give rise to significant differences in infrastructure response and costs.</p> <p>-Community pressure to provide amenity improvements for centres that are 'maintained' but not enhanced as a consequence of more dispersed approach.</p> <p><i>To business owners:</i> Compliance costs, specifically where discretion is limited but uncertain as to outcomes.</p> <p>-Reduced level of certainty for those owners that have invested in retail activity within existing centres, also</p>	

	<p>economic uncertainty where 'opportunities' for non-centre retail typologies are overly constrained in those environments in terms of design responses.</p> <p><b>Environment:</b> Increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as activities consolidate.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Description: Non-centre locations</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> Opportunity and agglomeration social costs where particular typologies that could otherwise establish in centre prefer other locations.</p> <ul style="list-style-type: none"> <li>-Overabundance of flexibility of business location and operation may reduce the functioning of commercial centres as focal points for community activity. Reduced choice for the less mobile (limited).</li> </ul> <p><i>To the council:</i> May over time give rise to pressure for the duplication of social and community facilities and public transport routes / frequencies where customer travel patterns become dispersed as a consequence of marked changes in commercial distribution.</p> <p><i>To business owners:</i> Some risks to incompatible incumbent activities, due to resultant public reverse sensitivity issues.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Can decrease extent of employment opportunities where intensive industrial activities are replaced by less FTE intensive retail outlets.</p> <p><i>To the council:</i> Costs associated with uncertainty as to the extent of infrastructure around the type of business activity that may occur in a more dispersed commercial approach.</p> <ul style="list-style-type: none"> <li>-Community pressure to provide amenity improvements for centres that are 'maintained' but not enhanced as a consequence of more dispersed approach.</li> </ul> <p><i>To business owners:</i> Compliance costs, specifically where discretion is limited but uncertain as to outcomes.</p> <ul style="list-style-type: none"> <li>-Some reduced level of certainty for those that have invested in retail activity within existing centres, also uncertainty as to compliance with local environmental standards.</li> <li>-Potential localised reduction in land (particularly industrial) and physical resources for existing activities and associated rent / land price influences.</li> </ul> <p><b>Environment:</b> Increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as commercial activities are more distributed, although reduced through criteria applied under policies 7 and 8.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Industrial land allocation and use</b></p> <p><b>Social:</b></p> <p>There are no anticipated material social costs as a result of the policies.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Can decrease extent of localised employment diversity within industrial areas.</p> <p><i>To the council:</i> No anticipated material economic costs.</p> <p><i>To business owners:</i> Some certainty risks to incompatible (non-industrial) incumbent activities, due to resultant public reverse sensitivity issues, and desire to efficiently use the scarce industrial land resource.</p> <ul style="list-style-type: none"> <li>-Can reduce or prevents brownfield regeneration of small industrial pockets surrounded by residential through limiting diversity of activities.</li> <li>-Compliance with local and strategic environmental standards. Increased financial contributions for targeted infrastructure (wastewater and roads) improvements.</li> <li>-Increased certainty of limited industrial land supply could potentially increase rent seeking and land banking.</li> <li>-Potential minor increase in property development costs associated with development within commercial centres and identified growth corridors due to restricting the ability of retail and office development to locate within industrial zones.</li> <li>-Decreased range of potential uses for a property.</li> </ul> <p><b>Environment:</b> There are no significant potential costs to the environment as a result of these policies, provided that infrastructure / mitigation of effects is managed to respond to development in concentrated industrial areas.</p>	
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	<b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.		
Benefits	<p><b>Commercial intensification at specific locations</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> Agglomeration of activity in commercial centres provides for an environment that is enhanced through critical mass. This improves community well-being, and the co-location of associated community activities.</p> <p>-Benefits in terms of accessible employment opportunities, and transport mode choice to surrounding residential intensification areas.</p> <p><i>To the council:</i> Ability to plan for and provide benefits in terms of community facilities and its existing infrastructure and services (including public and private infrastructure) in providing social, recreational and leisure opportunities to nearby residents.</p> <p><i>To business owners:</i> Provides certainty in the locational parameters around the provision of business infrastructure, and likely catchment growth.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Focus on integration of centres with public transport and better mode choice improves efficiency and reduces multi-trips.</p> <p>-Improves functional amenity of centres as these consolidate.</p> <p><i>To the council:</i> Ability to plan for, and ensure the efficient development of transport and community infrastructure around and within commercial centres and identified growth corridors.</p> <p>-Proactive ability to identify and manage mitigation measures for the integration of the transport network with consolidated commercial, recreational and social infrastructure within commercial centres and identified growth corridors.</p> <p><i>To business owners:</i> Increased certainty associated with supporting private and public investment, including infrastructure, public transport, community services and facilities and amenity improvements.</p> <p>-Increased certainty regarding investment decisions within existing centres, particularly in relation to consolidation of activities and adjoining intensifying residential catchments.</p> <p><b>Environmental:</b> Increased certainty in the investment of amenity improvements, from small scale maintenance and enhancement works, to larger scale 'main street' redevelopments.</p> <p>Increased integration with public transport initiatives and non-vehicle mode choices.</p> <p>-Overall managed risk to people and communities' health and safety and improved well-being through integrating the transport network, and providing standards for maintaining character and amenity.</p> <p>-Benefits to urban form and growth through consolidating commercial, recreational and social infrastructure within close proximity to higher residential densities.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Centre development, formation and functional amenity</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> Link between the distribution of centres and providing for Auckland's social needs, and the role of centres as community focal points (Policy 3).</p> <p>-Linking the distribution / expansion / provision of new centres with locations of living areas achieves better access to goods and services.</p> <p>-Focus on integration of centres with public transport, particularly the Frequent Transport Network and transport modal choice (policies 3(g) and 5(h)).</p> <p>-Limits adverse effects on people and communities who rely on central city and major centres for social (and economic) well-being (Policy 2).</p> <p>-Expansion of centres (Policy 5) linked with potential ability to provide a greater range of goods and services to the surrounding catchment.</p> <p>-Provides for the orderly establishment and co-ordinated development of new commercial centres as focal points for greenfield communities within the RUB (Policy 7).</p> <p>-Provides for a quality environment and improved design in the accommodation of commercial growth and intensification of commercial centres (Policy 2, Policy 3(a)). Promotes a sense of place, safety and security.</p> <p><i>To the council:</i> Link between expansion of centres, new centres and urban form considerations enables long term planning for a range of associated activities (i.e. recreation, leisure and residential facilities).</p> <p><i>To business owners:</i> No material social benefits.</p> <p><b>Economic:</b></p>	<p>Benefits could be similar to preferred alternative, but achieved at a slower pace and higher overall cost.</p> <p>Incremental benefits will be obtained through Plan Changes.</p> <p>A benefit of the status quo is that it is largely known, in settled property and development rights, and in the opportunities that exist within and based on those.</p>	<p>High benefit through apparent flexibility of location and operation, reduced compliance costs.</p> <p>Range of choice for those with cars, as subject to increased dispersed congestion.</p> <p>Encourages larger essentially car based activities to locate out of centres, may reduce some localised in-centre transport conflicts.</p>

	<p><b>To the community:</b> Link between the distribution of centres and providing for the region's economic needs, i.e. public transport integration, access to consolidated commercial employment.</p> <p><b>To the council:</b> Allows for the strategic planning of the transport network and other public and private infrastructural resources, including targeted mitigation of transport congestion.</p> <p><b>To business owners:</b> Link between distribution of centres and providing for the city's economic needs.</p> <ul style="list-style-type: none"> <li>-Reasonable level of certainty regarding investment decisions within existing centres, particularly in relation to residential intensification areas, consolidated centres and public investment in infrastructure (social, transport).</li> <li>-Recognition that other opportunities for non-centre commercial development are available / appropriate where it can be demonstrated that such activities no not cause tangible local / strategic adverse effects.</li> </ul> <p><b>Environmental:</b> Ensuring that the consolidation / expansion of an existing centre is not at the expense of its function, role and amenity (Policy 2, Policy 5).</p> <ul style="list-style-type: none"> <li>-Addressing strategic and local adverse effects of new centres (Policy 6).</li> <li>-Creates efficiencies in terms of trip journeys and generation.</li> <li>-Addressing the appropriateness of commercial centre expansion in relation to both strategic and local considerations, including: facilitating an efficient and sustainable distribution of centres; management of interface issues as commercial / centre boundaries expand; and continued integration with the transport network and modes (Policy 5).</li> <li>-Linking the distribution of centres with a compact urban form, and access / integration with the transport network and modes.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Identified growth corridor, formation and functional amenity</b></p> <p><b>Social:</b></p> <p><b>To the community:</b> Ability for inhabitants / pass-by trips on identified growth corridors to access a wider range of commercial activities / employment.</p> <ul style="list-style-type: none"> <li>-Ensure that new commercial trends and activities can be accommodated, given centre capacity issues.</li> <li>Increases the potential capacity for the provision of a full range of commercial activities, including larger format activities.</li> <li>-Opportunity benefits where trade supply retail migrates to the general business zone from commercial centre zones providing for increased small grain functional amenity improvements in centre.</li> </ul> <p><b>To the council:</b> Provides for some opportunity for improved amenity as a consequence of re-development.</p> <p><b>To business owners:</b> No material social benefits.</p> <p><b>Economic:</b></p> <p><b>To the community:</b> Can increase the diversity of employment opportunities in a localised area.</p> <p><b>To the council:</b> Provides for appropriate economic growth where balanced with scarcity of industrial land resource and centre compatibility.</p> <ul style="list-style-type: none"> <li>-Reduced administration costs based on a more nuanced view in providing for some commercial typologies along corridors.</li> </ul> <p><b>To business owners:</b> Recognises and provides some certainty that out-of-centre commercial activity can be complementary rather than compromising the existing centre network (through provisions relating to typologies).</p> <ul style="list-style-type: none"> <li>-Provides opportunities for non-centre commercial development as available / appropriate where it can be demonstrated that such activities no not cause tangible local / strategic adverse effects.</li> </ul> <p><b>Environmental:</b></p> <ul style="list-style-type: none"> <li>-Addressing adverse effects of commercial activities on identified growth corridors, including impacts associated with adjoining residential amenity, cumulative effects on centres, and the scarcity of the industrial resource (Policy 7).</li> <li>-Ensuring that the formation of commercial activity on identified growth corridors is not at the expense of a compact urban form, and supports appropriately located employment areas. (Policy 4).</li> <li>-Linking the distribution of commercial activity on identified growth corridors and access / integration with the transport network and modes.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Description: Non-centre locations</b></p> <p><b>Social:</b></p> <p><b>To the community:</b> Ability for local residential catchments to meet immediate and accessible convenience retail</p>	
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<p>and commercial needs (leads to the establishment of neighbourhood and local centres)</p> <ul style="list-style-type: none"> <li>-Ensure that convenience activities can be accommodated based on likely demand and absence of strategic adverse effects.</li> <li>-Provides for small scale and home based commercial and office operations.</li> </ul> <p><i>To the council:</i> No material social benefits.</p> <p><i>To business owners:</i> Where these relate to owner – operator or small scale convenience premises ability to locate within or close to place of residence.</p> <p><b>Economic:</b></p> <p><i>To the community:</i> Can increase the diversity of employment opportunities in a localised area.</p> <p><i>To the council:</i> Reduced administration costs based on a more nuanced view in providing for some typologies outside of commercial centres / identified growth corridors.</p> <ul style="list-style-type: none"> <li>-Slight reduction in transport network, including public transport, infrastructure use and efficiency as range of convenience commercial activities can be equitably distributed throughout the wider region, although offset by reducing trips through having accessible convenience options.</li> </ul> <p><i>To business owners:</i> Recognises and provides some certainty that out-of-centre commercial activity can be complementary rather than compromising the existing centre network (through provisions relating to typologies).</p> <ul style="list-style-type: none"> <li>-Provides opportunities for non-centre commercial development are available / appropriate where it can be demonstrated that such activities no not cause tangible local / strategic adverse effects.</li> </ul> <p><b>Environmental:</b></p> <ul style="list-style-type: none"> <li>-Addressing adverse effects of commercial activities on wider compact urban form attainment (Policy 8), including impacts associated with adjoining residential amenity, cumulative effects on centres, and the scarcity of the industrial resource (Policy 7).</li> <li>-Addressing the scale / typology of commercial activities and linking these with the location of business activity.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Industrial land allocation and use</b></p> <p><b>Social:</b></p> <p><i>To the community:</i> Reasonably high level of certainty regarding location of industrial activity, in terms of desirability to avoid locating housing in proximity to industrial (principally heavy) industrial typologies.</p> <ul style="list-style-type: none"> <li>-Benefits in terms of a consistent and acceptable level of amenity and character, and reduction in reverse sensitivity effects (Policy 9).</li> <li>-Limited retail provided for enables employees and those in the area who may benefit from accessible small scale food and beverage (<math>100m^2</math>), dairy (<math>100m^2</math>) and service station provision. Also a range of trade supply activities are also provided in the light industrial zone as restricted discretionary activities.</li> </ul> <p><i>To the council:</i> No material social benefits.</p> <p><i>To business owners:</i> Where these relate to owner – operator or small scale convenience premises ability to locate within, close to place of residence.</p> <ul style="list-style-type: none"> <li>-Small level of opportunity benefits where industrial activity or more trade suppliers retail migrates to the light industrial zone from commercial centre zones, acknowledging that this has limited applicability.</li> </ul> <p><b>Economic:</b></p> <p><i>To the community:</i> Potential (net) benefit in employment opportunities (quantity not diversity)</p> <ul style="list-style-type: none"> <li>-Grouping of industrial activity and physical infrastructure provides for agglomeration and efficiency benefits, specifically in terms of the formation and use of servicing infrastructure such as roads.</li> <li>-The provision and protection of a sufficient and appropriately located industrial land resource (Policy 9 and 11) is fundamental in enabling a value-added internationally competitive economy and for Auckland to grow its core economic base.</li> </ul> <p><i>To the council:</i> Increased certainty and ability to plan investment in service infrastructure provision.</p> <p>Improved ability to plan and provide for additional demand in industrial land through rezoning.</p> <ul style="list-style-type: none"> <li>-Provision of confidence to the market in the ability for Auckland as a whole to be able to accommodate future industrial business growth.</li> </ul> <p><i>To business owners:</i> Increased certainty to business owners regarding investment decisions.</p> <ul style="list-style-type: none"> <li>-Certainty to business owners as to the level and extent of amenity expected, and accordingly anticipated within the industrial zones.</li> </ul> <p><b>Environmental:</b> Addressing local and strategic effects of industrial activity throughout the region and directing industrial activity principally towards accommodation in the industrial zones, thereby providing for these activities</p>		
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	<p>to better internalise their effects.</p> <ul style="list-style-type: none"> <li>-Ensures an appropriate level of design and capacity for servicing infrastructure, as well as resilience within such infrastructure to accommodate a wide range of industrial activities.</li> <li>-Benefits in terms of a consistent and acceptable level of amenity and character, acknowledging that these are 'working environments'.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>		
Risks	<p><b>Commercial intensification at specific locations</b> The extent of quantifiable information available to develop this policy and these methods is not uncertain and insufficient, but it is broad-based. However, the risks are reduced based on the inherent flexibility within the policy that while there is some primacy for commercial activities to be directed to commercial centres, and then identified growth corridors, there is a sufficient regulator to accommodate appropriate commercial development in locations outside these environments.</p> <p><b>Centre development, formation and functional amenity</b> The key risks to this approach relate to:</p> <ol style="list-style-type: none"> <li>1. the extent to which centre consolidation and expansion would occur but result in opportunity costs for surrounding residential intensification. However, the approach taken is that such expansion should not be avoided but should remain responsive to the resultant residential interface. Accordingly, a policy hierarchy that supports centre expansion over residential intensification is considered necessary given the inherent centre capacity issues and the primacy of directing commercial activity into such centres.</li> <li>2. the extent by which an appropriate balance is unable to be achieved between typologies of commercial activity and the preferred centre design response. Where uneven, the resultant risk is that functional amenity in centres is lost as activities seek non-centre sites further depleting industrial land resources, or that an appropriate level of design improvement is not achieved.</li> <li>3. the ability for in-centre activity to accommodate increased demand if household expenditure and growth extend beyond reasonable forecasts.</li> </ol> <p>These risks are recognised within the current policy provisions which provide some flexibility to accommodate changing patterns of demand, commercial typologies and the extent of commercial activity occurring in non-centre locations.</p> <p><b>Identified growth corridor, formation and functional amenity</b> The key risks to this approach relate to:</p> <ol style="list-style-type: none"> <li>1. the extent by which the quantum of identified growth corridors provides for a substantial shift in consumer patterns;</li> <li>2. the extent by which parking and amenity requirements would curtail demand in identified growth corridors.</li> </ol> <p>These risks are recognised within the current policy provisions which provide some flexibility to accommodate changing patterns of demand, commercial typologies and the extent of commercial activity occurring in non-centre locations. However, these are subject to criteria to ensure that strategic and local adverse effects are recognised and managed.</p> <p><b>Non-centre locations</b> The key risk to this approach is the extent by which the quantum of commercial activity is able to locate outside of the centre network and identified growth corridors.</p> <p>This risk is commensurate with the degree to which centre capacity can be provided, and the nature and extent of identified growth corridor provision. These risks are recognised within the current policy provisions that seek to provide some flexibility as to accommodate changing patterns of demand, commercial typologies and the extent of commercial activity. However, where there is not sufficient capacity provided in areas that support a compact urban form, the default provision of a substantial extent of commercial provision would occur in 'other areas', contrary to the wider strategic provision and vision in the Auckland Plan.</p> <p>The risk is that these provisions provide degrees of enablement for commercial development (as subject to the criteria in policies 7 and 8), in a manner that would contravene the attainment of Objective 2 of RPS 3.1. That objective seeks a more selective intensification in centres / identified growth corridors so as to co-ordinate residential intensification, functional amenity and public transport initiatives, whilst seeking to achieve Objective 1</p>	<p>Overall risk of the status quo approach is that it fails to achieve potential, and is unable to provide sufficient opportunity for economic growth.</p> <p>The key risk is a reduction in Auckland's overall economic competitiveness and an Auckland-wide reduction, over time, of social and economic well-being.</p>	<p>The risk in terms of commercial activity is a non-equitable loss in functional amenity spread across a number of commercial centres in Auckland. Metropolitan centres are of such a critical mass and functional amenity that they would be largely unaffected, in RMA terms, by a more dispersed commercial distribution. However, there are a number of centres that would be the subject of significant distributional effects and consequential losses in functional and visual amenity – many of these centres exist in less economically robust and mobility deprived areas. There would also be substantial costs in terms of infrastructure provision and efficiency.</p> <p>In terms of industrial land supply, such an approach would be markedly inefficient in that it would deplete the scale and extent of scarce industrial land resources.</p>

	<p>of RPS 3.1. The manner in which this is reconciled is reduced where the 'degrees of enablement' relate to typologies that would remain compatible with a compact urban form (through rules), and ensuring sufficient 'in centre capacity' is provided for (through zoning).</p> <p><b>Industrial land allocation and use</b></p> <p>Risks to this approach relate solely to the extent by which an appropriate supply of industrial land can be sustained to provide for demand, such that Policy 9 and Objective 3 of RPS 3.1 can be attained, and that the appropriate infrastructure is provided / accessible (Policy 10).</p> <p>There is some risk associated with the extent by which non-industrial land options are curtailed through an absence of capacity to accommodate these in more appropriate zones (i.e. commercial activities within centres or general business zones) which would result in pressure on light industrial zones becoming a default commercial proposition reducing the integrity of Policy 11.</p>		
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## **2.13 Conclusion**

There is a spectrum of intervention approaches, from overly conservative protection of existing centres to a more dispersed approach. In the Auckland context, there are a number of competing land uses for scarce industrial and commercial land areas, coupled with a substantially increasing resident population and associated expenditure levels. It is recognised that industrial land activity, which accounts for a third of employment in the region, and substantially provides for Auckland's core economic competitiveness (and consequently economic spending power), is particularly vulnerable to being disenfranchised for the very categories of business for which industrial land was established.

Further still, there is not the ability to simply rezone more land for business activities. The formation of additional industrial land is constrained by factors such as identifying long-term expansion opportunities through the RUB, the ability to provide for servicing, conflicts with potential residential greenfield development, proximity to transport routes and ground conditions. Commercial centre development is constrained in that the majority of the major sub-regional centres (metropolitan and town centres) are surrounded by historic housing areas, are targeted with providing substantial residential intensification, and generally contain a multitude of historic and new commercial developments, and fragmented land titles.

Accordingly, a 'centres plus' approach recognises the significant physical resources of existing centres, the need for new capacity through identified growth corridors, and the scarcity of the industrial land resource, and provides a strategy which provides for some balance between these competing aims and allows for the consideration of both strategic effects and the external effects on the network of commercial centres.

It encourages activities to co-locate and integrate, and by doing so promotes reduced vehicle trip lengths, encourages walking and cycling, reduces transport congestion, and improves certainty in public transport initiatives. It also provides a degree of certainty, which is important in ensuring that a centre's function and amenity are retained. This is identified as an important outcome within the Auckland Plan.

The approach however does not protect incumbent business developments and existing centres from competition. The approach seeks to provide a framework cognisant of the capacity issues associated with existing centres, but provides for centre consideration not only separately (against prospective large scale commercial proposals) but as the network as a whole, their integration with the transport network and intensifying residential densities in terms of the attainment of a 'compact urban form'.

The approach seeks to be balanced in terms of retail distribution, in that not all retailing in business locations is restricted by activity status. That which is restricted is typically a discretionary activity. In terms of distributional considerations, there are nuisance and character considerations which result in some typologies being non-complying activities. The chief concern is a balance with supply, focussing on centre intensification and expansion, and new centres and the appropriate inclusion of identified growth corridors. If too little capacity is provided in those locations, ultimately 'other areas' will become the default location for accommodating new commercial growth to the detriment of the strategic achievement of a compact urban form, and integrity within the industrial land resource.

### **3 Overview of Section 3.1 of Zone objectives and policies 3.1 – General Provisions for Centres, Mixed Use, General Business and Business Park zones**

#### **3.1 Subject Matter of this Section**

The purpose of Section 3.1 of the zone objectives and policies is to recognise, provide for and manage the specific business distribution issues that relate to the form, distribution and development of the broad range of commercial and general business activities within Auckland.

Business activity and its distribution form a crucial component in the economy, character and ongoing development of the region. It is fundamental to the attainment of regional policy provisions as set out in Section 3 of the RPS Enabling economic well-being. The location of commercial and general business activities underpins transportation networks and infrastructure servicing, as well as linkages to where people choose to live, work and play. The distribution of business activity and the ability to provide for and promote ongoing demand can lead to challenges to ensure appropriate flexibility to allow ongoing investment. It must also address both local and strategic adverse effects, including those associated with urban form and growth and the transport network. The district plan level objectives and policies provide the framework for the management and distribution of business activity across Auckland, and its broader integration with infrastructure, the transport network and residential environments. Provisions for specific zone types are then included in sections 3.2 City Centre to 3.11 Heavy Industry zone.

#### **3.2 Resource Management Issue to be Addressed**

Two resource management issues are addressed through these provisions:

- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well-being

These issues are addressed by the objectives in a manner that:

- (a). Provides for a wide range of opportunities to develop economic and employment growth Auckland-wide. (Objective 1)
- (b). Provides appropriate flexibility for changing business activity, while addressing urban form and growth, the transport network and residential intensification. (Objective 2).
- (c). Identifies appropriate mechanisms to ensure that such resources associated with existing commercial centres, specifically the city centre, metropolitan, and town centres are sustainably managed for existing and future communities.
- (d). Creates a pattern of distribution for commercial activity which:
  - (i). Reinforces the agglomeration of commercial activity within major centres as the primary location for commercial activity (Objective 2)
  - (ii). Links with other aspects of urban form, such as relationships to residential zones, transport routes, employment, and the provision of community facilities (Objective 1)
  - (iii). Efficiently uses and strengthens existing centre resources, including public infrastructure, public open space provision and the network of community and social facilities, to enhance the visual and functional amenity of existing centres (Objective 1)
  - (iv). Addresses adverse effects, through ensuring that activities are appropriate in form, scale and design quality.

Thirteen specific policies are set out for these objectives, together with implementation methods for each policy. These policies can be grouped as follows:

- 1) Ensure that Auckland's network of centres is strengthened in terms of visual and functional amenity (Policy 1).

- 2) Ensure development reinforces a quality environment (policies 2 to 13).

### **3.3 Significance of this Subject**

The business zones reinforce the role of centres as focal points for business and community investment and recognise the need to provide suitable locations for specific industry types. The centres zones and Mixed Use zone are all expected to accommodate a substantial increase in the density and diversity of business activity, and housing provided that this does not preclude opportunities for business development. A high standard of built environment amenity is required in the centres and the Mixed Use zone.

The General Business zone provides locations for development that may not be appropriate in centres, or may have particular characteristics that require separation from pedestrian-intensive and sensitive uses. A good standard of amenity is expected in the General Business zone, recognising that some activities that establish in the zone may attract reasonable numbers of people. The Business Park zone provides for clustering of office-type business activities in a park or campus-like environment, where such uses will not impact on the viability of the city centre, metropolitan or town centres.

The centre zones are the primary location for growth of commercial activities. The highest intensity of activity is permitted in the City Centre zone, recognising the role of that centre as the focus of national and international business, tourism, educational, cultural and civic activities. The Mixed Use zone is located close to centres and along frequent public transport corridors. It provides a transition, in terms of use and scale, with adjacent residential areas.

The scale and significance of the environmental, economic, social and cultural effects anticipated from the implementation of the provisions are related to the intention to become an international city, more liveable and high-performing economically. Significant residential and business growth, to be accommodated mainly within the existing urban area, means a substantial step up in the scale of buildings and intensity of land use activity, and in the quality of the built environment. Social and cultural effects will also be magnified, within an increasingly dense urban environment.

### **3.4 Auckland Plan**

The Auckland Plan Development Strategy recognises that strengthening Auckland as an international city relies on improved, balanced socio-economic development across Auckland, so that all residents share in its prosperity. It aims to improve economic performance by prioritising innovation and the clustering of activities. It acknowledges that a competitive Auckland requires a world-class city centre. Second, the Development Strategy promotes a better quality of life for all Aucklanders, by encouraging access to more housing and jobs, as well as opportunities for recreation, cultural, and leisure activities. To achieve sustainable development, Auckland's continued high population growth needs to be matched to a range of accessible, quality housing and employment choices. The emphasis is on growth in existing and compact urban areas which are served by efficient, safe public transport.

The Unitary Plan implements the 'centres plus' approach of the Auckland Plan, with a recognition of the need for more overall opportunities for business growth, and alternative locations and business typologies.

Auckland Plan economic priorities include growing a business-friendly and well-functioning city; developing an innovation hub of the Asia-Pacific Rim; becoming internationally connected and export-driven; enhancing investment in people, to grow skills and a local

workforce; and developing a creative, vibrant international city. The Auckland Plan directives include:

*6.1 - Plan and provide for sufficient business-zoned land and infrastructure to achieve employment capacity targets and improved economic opportunity.*

*6.2 - Ensure an efficient and effective regulatory process with strong public – private relationships, and implement a streamlined regulatory process that offers reduced uncertainty around cost, timing and outcome.*

*6.3 - Protect, enhance and improve business-zoned areas and business improvement districts.*

*6.6 - Support sector precincts and infrastructure development, science and technology parks, and innovation centres for key industries.*

*10.3 - Focus urban intensification in areas that have infrastructure in place or which can be provided in a timely and efficient manner, and close proximity and good walking access to community facilities, open space, high-frequency public transport, centres and business areas.*

*10.8 - Strengthen Auckland's network of metropolitan, town, local and neighbourhood centres so they are well-connected and meet community needs for jobs, housing, and goods and services, at a variety of scales. Auckland's network of centres will be the primary focus for retail and other commercial activity, providing a wide range of outlets in a competitive environment, while limiting out-of-centre retail and office development.*

*10.9 – Develop and manage business areas to complement centres, without undermining their role and function in the centres' network, and to provide for a diversity of opportunities for business and employment growth.*

*10.10 - Business park development should promote clusters of technology and innovation.*

### **3.5 Current Objectives, Policies, Rules and Methods**

The status quo alternative consists of continuing with the approach and objectives, policies and rules of the operative Auckland Council RPS and Regional and District Plans. In economic and business terms those plans represent a RPS approach similar to that of the proposed preferred alternative, and in particular for retail distribution with the relatively recent finalisation of Change 6 to the Auckland Council RPS. The differences between the status quo operative plans and the preferred alternative are mainly in the Unitary Plan proposed 30 year RUB for land supply, with new centres being created in conjunction with greenfields urban expansion. There is also to be a substantial increase in the physical scale of buildings for business activity in some zones, increased attention to the quality of the resultant built environment, and greater consistency of approach across Auckland. The operative sections of the Auckland Council District Plan (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Isthmus, Auckland City Central Area) are all in varying stages of giving effect to the RPS, and its Change 6 dealing with growth, centres and retail distribution.

### **3.6 Information and Analysis**

<b>Document</b>	<b>Purpose/Description</b>	<b>Date</b>	<b>Appendix</b>
Case law - centres and commercial activity		-	3.4.1
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Draft Auckland Plan – Technical Report: Centres</i>	Analysis of centres strategy, hierarchy and criteria	2011	3.4.5

<i>and Corridors</i> Auckland Council			
<i>Prioritising Centres</i> Auckland Council	Summarises the analysis of 80 centres across the Auckland region to aid the process of prioritising sustainable compact centres.	2011	3.46
<i>Capacity for Growth Study</i> Auckland Council	Report on residential, business and rural land availability in Auckland	2012	3.4.8
<i>Auckland Retail Economic Evidence Base</i> Fairgray, S RIMU Auckland Council	Existing retail distribution, and region-wide retail supply-demand balance	2013	3.4.9

### 3.7 Consultation Undertaken

See Appendix 3.39.2.

### 3.8 Decision-Making

See Appendix 3.39.3.

### 3.9 Proposed Provisions

The centre zones are the primary location for growth of commercial activities. They provide for activities that support a public realm of well-connected streets, a high-quality pedestrian environment, and efficient and accessible public transport. They allow for different levels of development intensity dependent on the function and location of the centre. The highest intensity of activity is permitted in the City Centre zone, recognising the role of the centre as the focus of national and international business, tourism, educational, cultural and civic activities. The Mixed Use zone provides a transition, in terms of use and scale, with adjacent residential areas.

Business activity is to be further enabled in General Business and Mixed Use zones outside of centres, and intensively in the Mixed Use zones around the fringe of the city centre. The centres zones and Mixed Use zone are all expected to accommodate a substantial increase in the density and diversity of business activity, and housing provided that this does not preclude opportunities for business development. A high standard of built environment amenity is required in the centres and the Mixed Use zone.

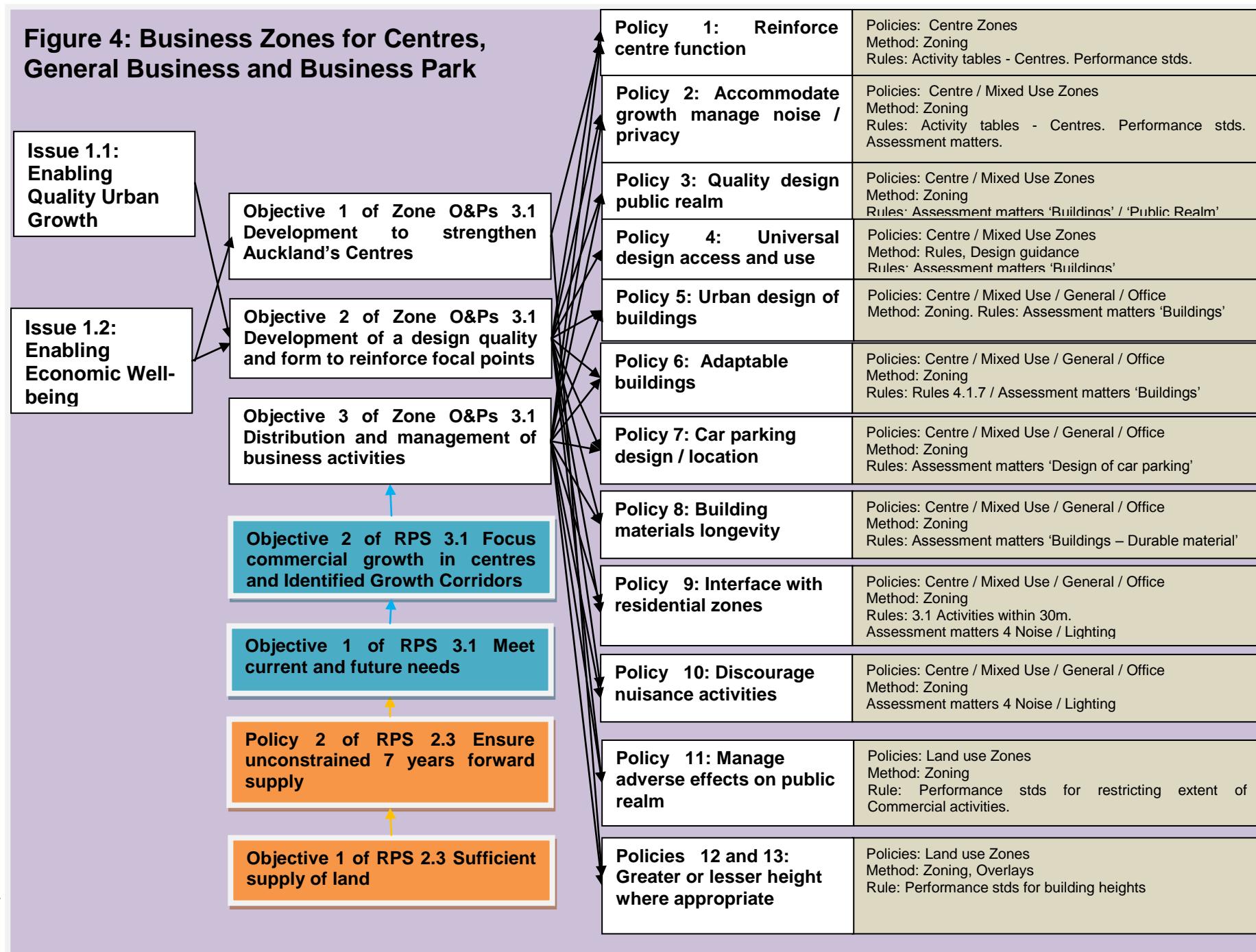
The General Business zone provides locations for development that may not be appropriate in centres or have particular characteristics that require separation from pedestrian-intensive and sensitive uses. A good standard of amenity is expected in the General Business zone, recognising that some activities that establish in the zone may attract reasonable numbers of people. The Business Park zone provides for clustering of office-type business activities in a park or campus-like environment, where such uses will not impact on the viability of the city centre, metropolitan or town centres.

### 3.10 Reference to other Evaluations

Refer Section 2.10 above.

The following Figure 4 demonstrates the linkages between the issues, the RPS objectives and policies, and the district objectives and policies.

**Figure 4: Business Zones for Centres, General Business and Business Park**



## 3.11 Objectives, Policies and Rules

### 3.11.1 Objectives

The following objectives in 3.1 General objectives and policies for Centres, Mixed Use, General Business and Business Park zones, in the zone objectives and policies, are proposed.

#### Objective

*1 Development strengthens Auckland's networks of centres as attractive environments with a mix of uses that provide employment, housing and goods and services at a variety of scales.*

#### Appropriateness

The objective identifies a distribution of activities which reinforce the role and function of Auckland's network of centres.

The objective provides for people and communities to be able to further their social, cultural and economic well-being. This is primarily through ensuring the distribution of commercial activity, and mix of uses including housing and employment which enhance the operation, function, viability and sustainability of the commercial centre network. They also support adjoining higher density residential opportunities and public transport initiatives, and associated social well-being.

In terms of sustaining the resources to meet reasonably foreseeable needs, such an approach requires some form of collaboration between local authorities, private landowners, and the people and communities who have a stake in the ongoing provision, role and function of these resources. The physical resources associated with business activity and its distribution across Auckland are identified through this objective as being managed to reinforce centres by:

- Addressing the ability to provide for the efficient use of buildings, land and infrastructure in business areas, and maintaining the efficiency of the road network
- Ensuring that commercial centres do not have their efficient operation, function, viability and sustainability diminished, for example by dispersed commercial activity.

The objective does not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems, nor health and safety. These aspects are to be inferred in the reference to 'attractive environments', and are the subject of Objective 2, as is the need to avoid, remedy or mitigate adverse effects.

The objective is also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources.

S7(ba) through minimising trip generation by agglomerating, in particular commercial activities, within town centres.

S7(g) in that the objective seeks to provide for the efficient use of buildings, land and infrastructure in business areas.

S7(c) and s7(f) through agglomerating similar and compatible activities so as to maintain amenity values and the quality of the environment.

The objective is useful in that it recognises the value of centres, extending beyond just the distribution of commercial activity but also as key focal points for surrounding communities of interest, community

and transport infrastructure initiatives, and nodes for employment. Strengthening the role of centres is important in terms of achieving a compact urban form for the City. The objective provides considerable certainty to business owners, community providers and the wider community that the role and function of the centre network is to be sustained.

The objective is achievable with the proposed Unitary Plan providing for a hierarchy of centre and business zones, and providing for a spectrum of commercial, community and residential activity, scale and intensity within each. It recognises that the larger the centre the higher the functional amenity and benefits to the community of interest (catchment). In this way a centres hierarchy is established and specific provisions are applied to maximise the diversity of activity as commensurate with the surrounding catchment, and the need to ensure the integration of such business zones with adjoining land uses.

**Objective**

*2. Development is of a form, scale and design quality so that centres are reinforced as focal points for the community.*

**Appropriateness**

A continuation of the theme of recognising and reinforcing the role of centres as focal points relates to ensuring that the distribution of activity considers infrastructural constraints, urban growth, and the potential nuisance and quality effects of business operations, and hence managing the use, development and protection of ... physical resources, sustaining the potential of physical resources to enable well-being.

The objective seeks to ensure that for people and communities to be able to further their social, cultural and economic well-being, the distribution of activity should not detract from the sustainability of the centre network. This could occur through diminishing the range of public and private services conveniently accessible to the community through a well distributed centre network. The centre network has a role in providing for social interaction. Development within centres should achieve a design quality and amenity as appropriate within important public realms.

In terms of sustaining the resources to meet reasonably foreseeable needs, such an approach requires balanced methods to ensure that sufficient capacity is provided through zoning to ensure that centres can expand and intensify as their role and function increases. There is also a need, through rules, to ensure that preferred in-centre activities are not prevented through strict design requirements.

The objective is also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in the continued use of natural and physical resources represented by the centre network.

S7(ba) reinforcing centres as focal points in conjunction with adjoining intensified residential use provides for improvements in modal choice and reduced trip generation.

S7(g) in that the objective seeks to provide for the efficient use of buildings, land and infrastructure in existing centres.

S7(c) and s7(f) as the objective specifically identifies a benchmark for a desired level of amenity values and the design quality of centre environments.

The objective is useful and reasonable in that it recognises and provides for the efficient use and development of existing physical resources represented by the network of centres. Further intensive development within centres can support a greater range of local services, facilities and employment, and increase the opportunity for safe walking and cycling.

The objective is achievable where the proposed Unitary Plan recognises and provides for expanding and increasing the density of centres, as well as appropriately providing for a diverse range of activities (social, employment and residential). It recognises that there is an appropriate balance between high quality design outcomes, centre functionality and individual activity, and operational and functional requirements. It seeks to do this primarily through establishing a centres hierarchy. A centres hierarchy for the City's many centres is important from a development context in terms of providing ongoing confidence. At a policy level establishing a hierarchy promotes alignment of the role, function and relative importance of the centre/s in terms of the Auckland Council's strategic and environmental policy for urban form, growth and transport in achieving a compact urban form.

It should be acknowledged that the hierarchy when applied to Auckland is not set in stone. As market conditions change, the nature and extent of the centres retail offer and even the establishment of new centres should result in the application of the hierarchy changing over time. The hierarchy provides the best policy tool for the distribution of major commercial growth at a strategic level, and a measure of certainty can be provided as to whether the scale and form of development envisaged is likely to be supported. Accordingly, the 2nd tier provisions set up the city centre, metropolitan, and town centres as the primary focal points for commercial intensification.

Maintaining and enhancing amenity values and a high quality of design requires ongoing commitment by both the council investing in the public realm, and developers in terms of private investment. Such an approach helps to sustain associated resources to meet reasonably foreseeable needs.

### **Objective**

*3. Business activity is distributed in locations and is of a scale and form that:*

- a. Provides for the community's economic needs;*
- b. Improves community access to goods, services, community facilities and opportunities for social interaction;*

### **Appropriateness**

Recognising and reinforcing the role of location and scale and form of centres ensures that the distribution of activity considers the community's economic well-being, access to goods and services, community facilities and social opportunities. Distribution, scale and form of business activity can also adversely affect strategic infrastructure and residential amenity if those effects are not managed, and hence managing the use, development and protection of ... physical resources, sustaining the potential of physical resources to enable well-being.

The objective seeks to ensure that people and communities are able to further their social, cultural and economic well-being. The distribution of activity should not detract from the sustainability local environments. The centre and business zone network have a role in providing for social interaction. Development within centres should achieve a design quality and amenity as appropriate within important public realms.

The objective provides for minimising certain health and safety effects, such as contamination, pollution, odour, hazardous substances, noise

- c. *Manages adverse effects on the environment, including effects on strategic infrastructure and residential amenity*
- and glare, through the focus on quality design and scale. This is also appropriate in terms of identifying the need to avoid, remedy or mitigate adverse effects.
- In terms of sustaining the resources to meet reasonably foreseeable needs, such an approach needs to ensure that sufficient capacity is provided through zoning to ensure that centres and business activity can expand and intensify as their role and function increases. Rules need to ensure that both preferred in-centre activities are not prevented through strict design requirements, and that adequate opportunity is provided to relocate from centres those activities which may have considerable opportunity costs to the establishment of finer grain and quality designed centre activities e.g. typically large format, trade, and yard-based retail.

The objective is also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in the continued use of natural and physical resources represented by the centres and business zone network.

S7(ba) reinforcing local accessibility to a range of business and employment opportunities in conjunction with adjoining intensified residential use provides for improvements in transport modal choice and reduced trip generation.

S7(g) in that the objective seeks to provide for the efficient use of buildings, land and infrastructure in existing centres.

S7(c) and s7(f) as the objective specifically identifies a benchmark for a desired level of amenity values and the design quality of these environments.

The objective is useful and reasonable in that it recognises and provides for the efficient use and development of existing physical resources represented by the network of centres and other business zones. Further intensive development can support a greater range of local services, facilities and employment, and increase the opportunity for safe walking and cycling.

The objective is achievable where the proposed Unitary Plan recognises and provides for expanding and increasing the density of business zones, as well as appropriately providing for a diverse range of social, employment and residential activities. It also recognises that there is an appropriate balance between high quality design outcomes, centre functionality and individual activity, and operational and functional requirements.

Maintaining and enhancing amenity values and a high quality of design requires ongoing commitment by both the council in terms of investment in the public realm, and developers in terms of private investment. Such an approach helps to sustain associated resources to meet reasonably foreseeable needs.

### **3.11.2 Policies**

Thirteen specific policies are set out for these objectives, together with implementation methods for each policy. These policies can be grouped as follows:

- 1) Policies seeking to ensure that Auckland's network of centres is strengthened in terms of visual and functional amenity (Policy 1).

- 2) Policies seeking to ensure development reinforces a quality environment (policies 2 - 13).

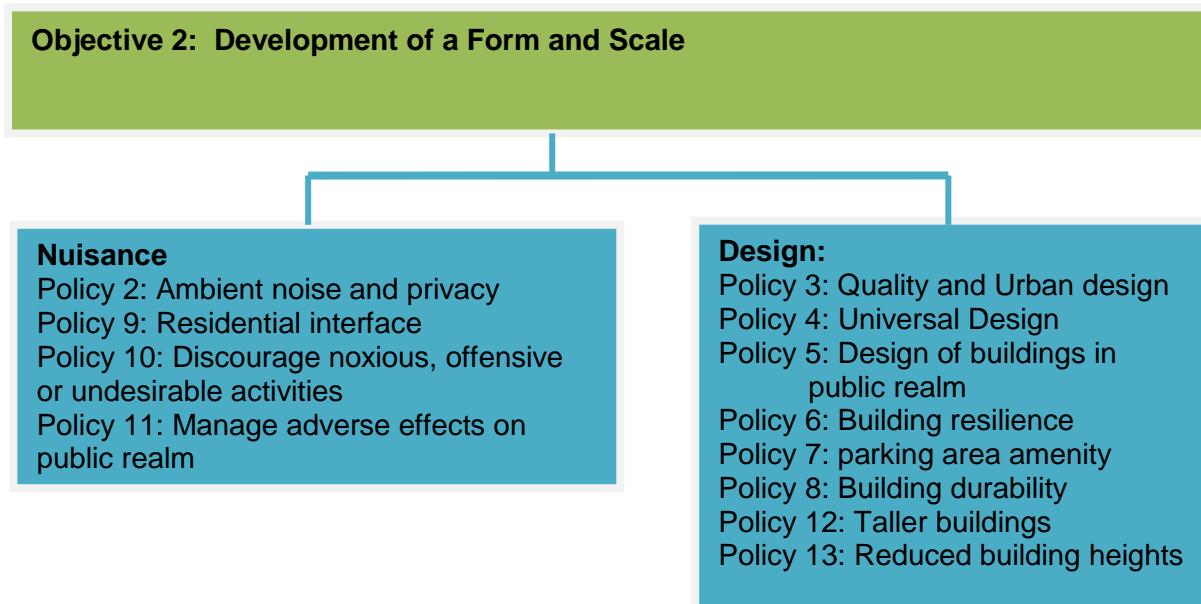
#### Function and Hierarchy

Policy 1: Reinforce the function of the city centre, metropolitan centres and town centres as the primary location for commercial activity.

#### Amenity, Design and Nuisance

These provisions can be considered collectively as they can be generally categorised as follows:

**Figure 5**



#### **3.11.3 Rules and other methods**

The proposed provisions are briefly summarised in 3.9 above and in sections 4 and 5 of this report, in terms of their significant differences to existing plan provisions.

#### Function and Hierarchy

##### **Methods**

- (i). Rules and activity tables for activities within and outside of the city centre, metropolitan centres and town centres as these relate to the extent, type and scale of commercial (retail and office activities).
- (ii). Assessment criteria.
- (iii). Area plans, centre plans, precinct plans.
- (iv). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### Amenity, Design and Nuisance

##### **Methods**

- (i). Rules and activity tables for activities within and outside of the city centre, metropolitan centres and town centres as these relate to the extent, type and scale of commercial (retail and office activities). Nuisance rules relating to environmental effects between zones.
- (ii). Assessment criteria.

- (iii). Area plans, centre plans, precinct plans.
- (iv). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### **3.11.4 Costs and Benefits of Proposed Policies and Rules**

Refer to Table 2 below for the environmental, social, economic and cultural costs and benefits of the policies/ rules.

#### **3.11.5 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed policies and methods.
- The evidence base and supporting information enables informed and transparent decision making.
- The risk of not acting is that the proposed policies and rules are required for sustainable management.

### **3.12 Alternatives**

Alternatives are:

1. Preferred
2. Status quo
3. Liberal approach to commercial centres as to the nature, range and amenity of activities and distribution of commercial activity, with focus on design guidance and advice
4. Holistic Blueprint governing all aspects of in-centre development through application of ‘Centre Master Plans’

The proposed preferred alternative is discussed in 3.9 above. The status quo alternative is outlined in 3.5 above.

#### **Alternative Three – Liberal approach to commercial centres as to the nature, range and amenity of activities and distribution of commercial activity, with focus on design guidance and advice**

This option was dismissed as it was not considered that Objective 2 (nor Issue 1.1 ‘Enabling Quality Urban Growth’ or the regional level provisions in Section 2.2 of the RPS ‘A quality built environment’) could be achieved without the explicit categorisation and recognition of the amenity considerations to be taken into account regarding the ongoing development of each tier within the commercial centre hierarchy. Such aspects would then be left to the market, which may favour economic benefits at the cost of lower environmental outcomes (such as the reduction in the extent of display windows, substantial areas of car parking to the front of commercial premises, or the significant increase in nuisance and environmental effects such as noise, shading and dominance). Such an approach may also lead to outcomes which result in poor building design, heights, and layouts which do not interact with or remain in context with the streetscape.

The benefits and costs of not having policy reinforcing commercial centres as focal points are highlighted in the regional level s32 assessment. In summary, the long term costs to the community of dispersed retail and office activity can be significant, including limiting the range of activities and facilities available by way of single vehicle trips, reductions in meeting social interaction, and poor transport network integration with commercial land use.

#### **Alternative Four – Holistic Blueprint governing all aspects of in-centre development through application of ‘Centre Master Plans’**

Such an approach could result in high and consistent amenity standards within the commercial centres. However, the increased uncertainty to private developers, community

providers and even the council, in terms of having all aspects of development and redevelopment considered against either an explicit set of urban design outcomes, or subject to an urban design panel, may well reduce development investment and force it into identified growth corridors and ‘other areas’. Such an approach would ensure that adverse effects are avoided, remedied or mitigated from in-centre development and provide for community health and safety, however over time, activity would not be able to establish in a way or at a rate that would provide for reasonably foreseeable needs and social and economic well-being.

The table below discusses each alternative compared to the proposed alternative.

**Table 2**

	<b>Preferred Alternative</b>	<b>Status Quo Alternative 2</b>	<b>Alternative 3 – Liberal approach to commercial centres as to the nature, range and amenity of activities and distribution of commercial activity.</b>	<b>Alternative 4 - Blueprint approach to centre development</b>
Appropriateness	<p><b>Commercial intensification at specific locations</b></p> <p><u>Function and Hierarchy</u></p> <p>Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that Policy 1 and the associated methods are the most appropriate to achieving objectives 1 and 3.</p> <p><u>Amenity, Design and Nuisance</u></p> <p>Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving objectives 2 and 3.</p>	<p>The status quo alternative consists of continuing with the approach and objectives, policies and rules of the operative Auckland Council RPS and Regional and District Plans. In economic and business terms those plans represent a RPS approach similar to that of the proposed preferred alternative, and in particular for centres growth, and retail distribution with the relatively recent finalisation of Change 6 to the Auckland Council RPS. The growth corridor concept is included in regional policy, but has only limited application (to Lincoln Road and Hobsonville Road), without further more detailed investigation. The differences between the status quo operative plans and the preferred alternative are mainly in the Unitary Plan proposed 30 year RUB for land supply, with new centres being created in conjunction with greenfields urban expansion. There is also to be a substantial increase in the physical scale of buildings for business activity in some zones, increased attention to the quality of the resultant built environment, and greater consistency of approach across Auckland.</p>	<p>The approach whilst achieving the objectives (i.e. a liberal approach), would not find overall support in Part 2 of the Resource Management Act.</p>	<p>While there is a place for seeking improved design and amenity in a number of key areas for centres, a prescriptive approach as set through a comprehensive blueprint for development would yield uneven results, detract from investment, and would be unlikely to be successful within existing centres where a considerable extent of physical infrastructure will likely be retained through the statutory life of the UP. Accordingly, the approach is not seen as appropriate. However, there are to be Area Plans for local areas, and in some cases leading to precinct plans for centres, integrating land use and development opportunities from the UP with infrastructure and public investment.</p>
Effectiveness	<p><b>Commercial intensification at specific locations</b></p> <p><u>Function and Hierarchy</u></p> <p>The policies and their methods and rules are effective, given that they seek to direct commercial, recreational, and social activities into the higher order commercial centres so as to better enable and consolidate social and economic well-being. They support transport modal choice and the improved efficiency of infrastructure, thus resulting in increased in-centre functional amenity, as well as consolidating urban form – through linking higher residential intensification areas with greater provision of commercial, social and transport infrastructure.</p> <p>The provisions require that regulatory hurdles are reduced, such as integrated transport assessments and recognition of the typologies of commercial activity in terms of design requirements (objectives in 3.3 and 3.4 of zone objectives and policies). They recognise the benefits to achieving a more sustainable urban form through consolidating a range of commercial activities, in conjunction with accommodation activities, residential activities, and community and social facilities (Objective 1 of zone objectives and policies 3.1).</p>	<p>The status quo approach is not seen to have been effective at encouraging and enabling economic growth to the extent desired. It does have many of the components and directions of the preferred alternative, but not at the scale and the rate of change proposed in the Unitary Plan.</p>	<p>The approach would not be effective in that it does not seek the outcomes identified in the Auckland Plan, nor does it provide sufficient guidance as to the wider community's expectations as to the role and function of centres, and the amenity and design considerations accordingly.</p>	<p>Whilst comprehensive blueprint planning for centres can promote certainty as to the anticipated amenity expectations, the absence of flexibility and the inability to accommodate all typologies, or changing trends in terms of commercial growth and centre formation would mean that improved functional and visual amenity across all centres would be uneven. Accordingly, it is not considered that the approach is effective in achieving the RMA.</p>

	<p><b>Amenity, Design and Nuisance</b></p> <p>The policies and their methods and rules are considered to be effective. The application of a centres hierarchy, associated heights and precincts, and provisions at the interface with residential and open space boundaries are differentiated in terms of the outcomes sought, and hence the provisions applied. The provisions maintain and enhance amenity and character within the commercial centre network through directing or agglomerating a diverse range of activities so as to better enable and consolidate social and economic well-being, and then assign associated design and environment quality requirements. Such an approach provides certainty and long term investment in the physical resources represented within the commercial centres, as well as those zones that adjoin these areas.</p> <p>Within the Key Frontage Overlay areas and the General Commercial Frontage Overlay areas there are performance standards providing for building to be located adjoining the street of 100% and 70% respectively. Within other areas of the higher order commercial centres, buildings are to adjoin the street at no less than 50% of the site frontage. These requirements reflect the specific outcomes sought for this area which consists of the highest concentration of public / private interface within the centre, and in turn requires a higher quality design response, which is accordingly set out in the accompanying assessment matters for buildings.</p> <p>The approach also recognises that where the public / private interface decreases within a commercial centre, a design response is required to ensure appropriate amenity provision, but of a lower order. Such an approach is considered highly effective in maintaining and enhancing the amenity of these different components of commercial centres, but needs to be fully balanced with the operational and functional requirements of the full range of commercial activities sought within centres.</p> <p>The provisions also require a proactive stance from the council to work in association with the community and private sector providers so as to contribute to the overall amenity of the commercial centres through investment in the public realm, as matched with investment from the private realm, or community facility providers.</p>			
Efficiency	<p><b>Commercial intensification at specific locations</b></p> <p><u>Function and Hierarchy</u></p> <p>The policy, methods and rules can be implemented for a minor cost, where there is not sufficient in-centre capacity provided, or as a 'release valve' for commercial activity to establish outside of centres. However, the benefits of a proactive stance on economic and business development through primarily directing commercial recreational and social activity into consolidated and conveniently located higher order centres are significant and range from individual money saving, through to a more integrated approach for the development of infrastructure and broader integration with urban form.</p> <p><b>Amenity, Design and Nuisance</b></p> <p>Maintaining an appropriate scale of development consistent with the anticipated character of commercial centres was a key message within the Auckland Plan. The policies and methods and rules identified, provide for a comparative development scenario that would be consistent with the existing scale, character and amenity within each tier of the commercial centre network hierarchy. The approach to set tangible expectations in terms of nuisance, amenity and associated with improvements to urban design parameters within specific precincts and centres provides the most appropriate means by which to implement Objective 2.</p>	<p>The status quo approach is not seen as efficient in encouraging and enabling economic growth to the extent desired. It does have many of the components and directions of the preferred alternative, but not at the scale and the rate of change proposed in the Unitary Plan. The costs, including time, are substantial. Management of business distribution is only partially efficient, in commercial office activity, but less so with large format retail and industrial land.</p>	<p>These options can be implemented at a major cost, as it relies on an expectation that the market will dictate which activities will succeed, their locational and design parameters, and that people will support developments that contribute to their well-being. However, this approach does not recognise the variety of communities that make up Auckland, many of which would be disenfranchised by a reduction in centre viability and vitality.</p>	<p>Implementing an overly prescriptive approach to design and amenity improvements within a centre has considerable community and private investment costs, and little to moderate benefits due to the potential to stifle investment, and / or dispersing centre activity to non-centre locations. It is also unlikely that the outcomes can be attained under this option.</p>
Costs	<p><b>Commercial intensification at specific locations</b></p> <p><u>Function and Hierarchy</u></p> <p><b>Social:</b></p> <p><i>to the community:</i> Slight reduction in choice for the provision of retailing and office activities in a wide variety of locations, which may have improved accessibility to a limited number of nearby consumers. Issues of congestion where associated with under provision of commercial opportunities.</p> <p>-Lost opportunities where some types of commercial activity are not able to locate within the city centre, metropolitan and town centres ('the higher order centre network').</p>	<p>Costs of the status quo approach include the plan changes required to give effect to growth and intensification in centres. These costs, to the council, can range from \$100,000 and one year for a simple plan change, up to \$300,000 and 3 years for more complex changes. Full</p>	<p>Costs of implementation of suggested design (limited and voluntary). Council costs of providing design costs and associated resources (limited).</p> <p>Decreases likely 'compression' in terms of the consolidation and</p>	<p>Administration and compliance costs associated with the lack of flexibility to accommodate changing trends or all patterns of development.</p> <p>Particular typologies may be difficult to establish within a tight urban design / blueprint framework,</p>

	<p>- (Limited) private transport congestion delays at higher order centres.      - (Limited) opportunity costs for more fine grained centre activities.  <i>to the council:</i> Can lead to congestion and capacity issues associated with social and transport infrastructure.  <i>to business owners:</i> may frustrate new entrants that may not be easily accommodated into commercial centres (or identified growth corridors).</p> <p><b>Economic:</b>  <i>to the community:</i> Increased costs in service / good provisions, reduction in opportunities where associated with under provision of commercial opportunities, specifically as associated with some larger format retail providers and large scale office provision.  <i>To the council:</i> Administration costs associated with the extent of applications.  <i>To business owners:</i> Increase in property development costs within commercial centres, both in acquiring sites and design considerations.      - Reduced opportunities for in-centre locations and hence increases in rent.      - Reduction in complete flexibility to facilitate the development of commercial activity out-of centres – reduction in certainty for existing out-of-centre developments not zoned (i.e. existing use rights reliance).</p> <p><b>Environment:</b> Increase in conflicts between transport modes (i.e. pedestrian and private vehicle) as activities consolidate at higher order centres.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Amenity, Design and Nuisance</b></p> <p><b>Social:</b>      There are no anticipated social costs as a consequence of these policies.</p> <p><b>Economic:</b>  <i>to the community:</i> (Limited) Costs of design / quality improvements will be passed onto consumers.  <i>to the council:</i> Administration costs associated with the extent of applications associated with 'broad' application of strict limitations when applied to a range of centres and commercial activities.  <i>To business owners:</i> Restrictions in building heights (as related to the centre hierarchy) can limit opportunities for development of sites.      - Application of differentiated Precincts (and associated design provisions) will require additional compliance costs.      - (Limited) decrease in centre activity through the functional requirements of some retail typologies not being able to comply with / provide for the amenity and design outcomes that are sought through the methods.</p> <p><b>Environment:</b> Blanket requirements can reduce opportunities for landmark or quirky development, or increasing the legibility of the streetscape.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p>	<p>implementation of the planning parts of centre plans can cost considerably more. These are only the costs to the council. There are also substantial costs to applicants and other participants in the planning processes.</p>	<p>diversity of activities within commercial centres (benefits / costs considered above).      Where left to the market, economic benefits may be favoured (at the individual level) at the cost of providing lower environmental outcomes (such as the reduction in the extent of display windows, or the significant increase in signage). Such an approach may also lead to outcomes which result in poor building design, heights, and layouts which don't interact with, or remain in context with the streetscape, adjoining properties or are sensitive to activities at the interface with commercial centre zones.</p> <p>Likely reliance on council to provide for substantial in-centre amenity improvements to either reduce decline or provide targeted public realm improvements (without a commensurate response from the private sector).</p> <p>Tall buildings in combination with high plot ratio can reduce the extent of open space and decrease the aesthetic values of adjoining public realm / residential amenity.</p> <p>Large commercial buildings may be poorly laid out (in terms of wider community expectations) in relation to other buildings, car parking and landscaping etc.</p> <p>Site specific application of compliance costs to seek to address amenity and reverse sensitivity issues</p>	<p>resulting in a loss of such activity to out-of-centre locations and decreased functional amenity in-centre.</p> <p>High economic costs of achievement for individual business owners.</p> <p>Reliance on council to provide equitable substantial in-centre amenity improvements to match extent of private investment.</p> <p>Centre amenity likely to be uneven, with those centres where there is reduced demand being unlikely to attract investment and hence design improvements. Area planning for local areas and their centres will be undertaken, and public investment, such as in street improvements, public open space and community facilities, will continue in all centres. The communities of each centre want the benefits of planning for their area but there are costs, in time and money, that limit how much planning can occur and whether it can provide effective outcomes from a detailed blueprint approach.</p>
Benefits	<p><b>Commercial intensification at specific locations</b></p> <p><b>Function and Hierarchy</b></p> <p><b>Social:</b>  <i>to the community:</i> Reinforcement of the link and synergies between the distribution and importance of centres in terms of functional amenity (commerce, employment and housing)      - Linking the distribution / expansion of centres with location of intensifying living areas achieves better access to goods and services.      - Confidence in role and function of centres, and longevity in terms of 'sense of place'.      - Avoids (significant) adverse effects on people and communities who rely on higher order centres for social well-being.      - Improves accessibility for those less mobile.      - Reinforcement of centres linked with potential ability to provide a greater range of goods and services for the surrounding community.      - Improves certainty in terms of social / community infrastructure providers as to sustainability of in-centre investment.  <i>to the council:</i> Ability to plan for and provide benefits in terms of community facilities and its existing</p>	<p>Benefits include a known planning system and processes, even with inefficiencies, and case law around centres hierarchy, retail distribution and urban planning.</p>	<p>Provides for considerable business flexibility in terms of design, functional requirements and operational characteristics.      Fewer administration costs.</p>	<p>Promotes certainty for business owners as to design expectations, and adjoining zones as to environmental outcomes (nuisance and amenity) expected at the interface.</p> <p>High level of amenity for those centres which are in areas subject to increase household expenditure and likely demand.</p> <p>Certainty of council as to public realm and public transport initiatives.</p>

	<p>infrastructure and services (including public and private infrastructure) in providing social, recreational and leisure opportunities to residents.</p> <p><i>to business owners:</i> Provides certainty in the locational parameters around the provision of business infrastructure, and likely catchment growth.</p> <p><b>Economic:</b></p> <ul style="list-style-type: none"> <li><i>to the community:</i> Limits adverse (significant) effects on people and communities who rely on the centre(s) for economic well-being.</li> <li>-Increased opportunities for employment formation (diversity / quantity) within closer proximity to residential intensification.</li> <li>-Improves agglomeration and hence efficiency.</li> <li>-Creates efficiencies in terms of trip journeys, generation and public transport initiatives.</li> <li>-Reduces congestion (overall) across the network, i.e. a net benefit in terms of consolidation.</li> </ul> <p><i>to the council:</i> Ability to plan for, and ensure the efficient development of transport and community infrastructure around and within higher order centres.</p> <ul style="list-style-type: none"> <li>-Proactive ability to identify and manage mitigation measures for the integration of the transport network with consolidated commercial, recreational and social infrastructure within commercial centres and identified growth corridors.</li> <li><i>to business owners:</i> Increased certainty associated with supporting private and public investment, including infrastructure, public transport, community services and facilities, and amenity improvements.</li> <li>-Increased certainty regarding investment decisions within existing centres, particularly in relation to consolidation of activities and adjoining intensifying residential catchments.</li> <li>-Increased certainty / efficiency in terms of investment in physical infrastructure.</li> </ul> <p><b>Environmental:</b> Increased certainty in the investment of in-centre amenity improvements, including small scale maintenance and enhancement works, to larger scale 'main street' redevelopments.</p> <ul style="list-style-type: none"> <li>-Increased integration with public transport and non-vehicle mode choices.</li> <li>-Overall managed risk to people and communities health and safety, and well-being through integrating the transport network, and providing standards for maintaining character and amenity.</li> <li>-Benefits to urban form and growth through consolidating commercial recreational and social infrastructure within close proximity to higher residential densities.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><u>Amenity, Design and Nuisance</u></p> <p><b>Social:</b></p> <p><i>to the community:</i> Those living along the interface / transitional areas adjoining higher order centres will have greater certainty as to residential amenity expectations.</p> <p><i>to the council:</i> Likely decrease in nuisance disputes at the residential interface with commercial centres.</p> <ul style="list-style-type: none"> <li>-Increased certainty in capital investment to reinforce 'sense of place'.</li> </ul> <p><i>to business owners:</i> Provides certainty in the amenity, design and nuisance expectations of adjoining developments.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Improved amenity and functioning of the centre reduces likelihood of centre decline.</p> <ul style="list-style-type: none"> <li>-Decrease of amenity degradation at transitional boundaries as a proxy indication of reduction in housing economic value.</li> </ul> <p><i>to the council:</i> Ability to plan for and provide benefits in terms of amenity projects for centres.</p> <p><i>to business owners:</i> Improved amenity and functioning of a centre is likely to have flow on effects to customer usage and may improve profit margins.</p> <ul style="list-style-type: none"> <li>-Increased certainty in terms of the physical resources associated with business activity within commercial centres, given the design and quality focus associated with redevelopment and consolidation of activities within the centre.</li> <li>-Identification and application of differentiated provisions regarding the outcomes anticipated within Precincts provides certainty to the council and developers as to the outcomes sought from investment in these areas.</li> <li>-Maximum building height (as identified within the centre Hierarchy) provides opportunities for</li> </ul>		
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	<p>flexible building development, although this is tempered in that opportunities are somewhat constrained by existing physical resources and cadastral boundary configuration.</p> <p><b>Environmental:</b> The range of provisions associated with improving the amenity and character of commercial centres will be consistent with the principles outlined in the Ministry for the Environment's Urban Design Protocol (2005). The protocol seeks to provide principles for improving urban design and the quality of the environment. Provisions such as avoiding blank walls along frontages, and encouraging a diversity of buildings and uses will be consistent with Objective 2 seeking to achieve a form, scale and design response as appropriate with the centre. Such an approach also enhances the diversity and adaptability of commercial centres.</p> <p>Improvement in public realm quality and in poor design, visual clutter, or incompatible nuisance effects (wind, privacy intrusion, and other offensive or noxious qualities) can improve the aesthetic values and amenity of commercial centres.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>			
Risks	<p><b>Commercial intensification at specific locations</b></p> <p><u>Function and Hierarchy</u></p> <p>There are costs to the environment anticipated as a result of the application of this policy, which arise through a lack of explicit mention of a number of relevant factors in relation to considering proposals beyond existing higher order centres. This creates a potential risk to the environment if these factors are not considered, however this risk is lessened through the regional level policy provisions that recognise that whilst there is some primacy to establishing commercial activity in a centre that other opportunities exist, subject to criteria relating to strategic urban form.</p> <p><u>Amenity, Design and Nuisance</u></p> <p>The key risk is that the extent of design requirement does not appropriately take into account the functional, operation and viability requirements of a number of commercial providers (being larger scale retail and substantial office developments) and hence reduce their propensity to be able to establish within centres, thereby decrease potential functional amenity of the centre network. However, this risk is reduced through prospective objectives in the metropolitan and town centre zones that seek to recognise and differentiate design outcomes based on retail typologies.</p>	<p>Overall risk of the status quo approach is that it fails to achieve potential, and is unable to provide sufficient opportunity for economic growth.</p> <p>The key risk is a reduction in Auckland's overall economic competitiveness and an Auckland-wide reduction, over time, of social and economic well-being.</p>	<p>The key risk is a reduction in Auckland's overall economic competitiveness and a region wide reduction (over time) of well-being and the quality of the urban environment.</p>	<p>The risk is the inequitable attainment of amenity and design that would be able to be achieved across all centres. There would be a number of centres where lower household expenditure and demand would not be sufficient to facilitate substantial amenity and design improvements through stifling re-investment</p>

### **3.13 Conclusion**

Recognising and differentiating a commercial hierarchy for the City's many centres is important not only from a development context in terms of providing ongoing confidence; but also at a policy level as establishing a hierarchy promotes alignment of the role, function and relative importance of the centre/s in terms of the council's strategic and environmental policy for urban form, growth and transport. The approach provides for the ability to apply amenity and character provisions based on the scale and density of activity that can be anticipated at each 'tier' in the hierarchy. It also links together the likely functional amenity with increasing residential densities and public transport initiatives. Such an approach also provides greater certainty in relation to amenity at the interface with surrounding zones, and the expectations in terms of in-centre design and environmental quality.

## **4 Overview of Section 3.3 (Metropolitan Centre zone) to 3.6 (Neighbourhood Centre zone) in zone objectives and policies**

### **4.1 Subject Matter of this Section**

The purposes of Sections 3.3 to 3.6 of the zone objectives and polices are to recognise, provide for and manage the specific business distribution issues that relate to the form, distribution and development of development within the respective tiers of the centres hierarchy.

The objectives and policies for centres are contained in the zone objectives and policies in;

- 3.3 Metropolitan Centre zone
- 3.4 Town Centre zone
- 3.5 Local Centre zone
- 3.6 Neighbourhood Centre zone

In applying the centre hierarchy to commercial nodes within Auckland it is important to remember that even centres within the same tier of the hierarchy will have different traits and characteristics. There is a sliding scale between the function and role of the smallest centre and that of the City Centre zone (which is considered in a separate Section 32 report). All other centres within Auckland sit within this spectrum, albeit in some generic groupings, which has been used as the basis for applying tiers, and appropriate zones accordingly.

Unless well-managed, the centre network may not adapt in a manner that provides for emerging commercial and social development and trends in a way that manages the strategic and localised adverse effects of such development. There is also a desire to ensure that investment and redevelopment of centres brings with it improvements in the quality of the public realm, and improvements in the diversity of activity available. Lastly, there is a need to ensure that the higher order centres (metropolitan and town) provide key focal points for intensification of activity, employment, residential intensification and transport integration to achieve a compact urban form.

### **4.2 Resource Management Issue to be Addressed**

As with Section 3 of the RPS ‘Enabling Economic Well-being,’ two resource management issues are addressed through these provisions, they are:

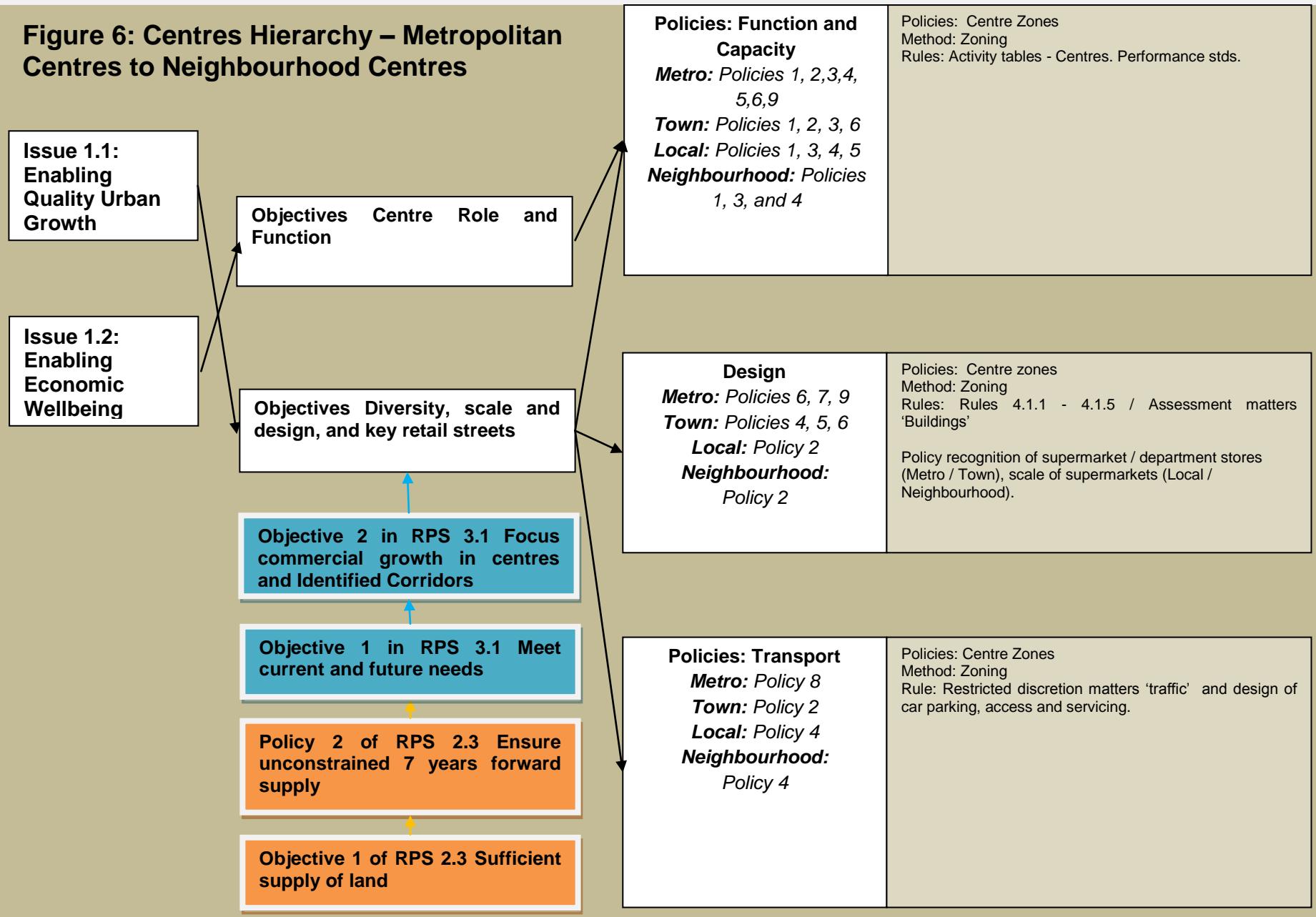
- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well-being;

These issues are addressed by objectives in sections 3.3 to 3.6 in the zone objectives and policies, for each level of the centres hierarchy, in a manner that:

- (a) Sets the function and role of each level of the hierarchy, and to provide for intensification in a manner that will enhance the ability to provide capacity for commensurate increases in demand in commercial activities and employment, with the largest extent of development to be focused (after the city centre) at metropolitan centres, and the more convenience and local needs to be met at the other end of the spectrum within neighbourhood centres. (objective 1 in each of sections 3.3 to 3.6);
- (b) Improving the quality of the public realm, and expanding the diversity and scale of activity as appropriate to each tier in the centres hierarchy. (objectives 2 in sections 3.3, 3.5 and 3.6 and objectives 2 and 3 in Section 3.4)

The policies and respective methods can be grouped as follows:

**Figure 6: Centres Hierarchy – Metropolitan Centres to Neighbourhood Centres**



### **4.3 Significance of this Subject**

The Unitary Plan provisions for metropolitan centres, town centres, local centres and neighbourhood centres provide a more clearly defined hierarchy of centres, with distinct changes in scale and intensity between each tier. The Metropolitan Centre zone applies to centres located in different sub-regional catchments of Auckland. They are second only to the city centre in overall scale and intensity and act as hubs for high frequency transport within their catchments. The zone provides for a wide range of activities including commercial, leisure, high-density residential, tourist, cultural, community and civic services. Zone provisions, in conjunction with rules in the other business zones, reinforce metropolitan centres as locations for all scales of commercial activity. The Town Centre zone applies to suburban centres throughout Auckland, the satellite centres of Warkworth and Pukekohe, and the rural town of Helensville. The centres are typically located on main arterial roads, which provide good public transport access. The zone provides for a wide range of activities including commercial, leisure, residential, tourist, cultural, community and civic services. Provisions enable buildings between four to eight storeys high, depending on the characteristics of the centre. Increased height within the centres will facilitate increased office and residential living opportunities at upper floors.

There is a range of possible building heights within the centres zones depending on the context. Different parts of these zones have different attributes. In some cases these attributes necessitate an increase or decrease in the standard zone height. The different attributes include;

- the size and depth of a centre
- the status of the centre in the centres hierarchy
- existing or planned uses surrounding a centre and the interface between the centre, these uses and surrounding residential uses
- historic character
- landscape features
- height controls previously developed through a precinct or master planning exercise.

The city centre, metropolitan centres and town centres, and areas surrounding these centres, have been identified as the priority areas for commercial and residential growth. In and around some of these areas it is appropriate to enable greater heights from the standard zone height, to enable growth to occur.

In addition, the height in and around some centres is lower than the standard zone height due to the local context, including historic character or landscape features

The Local Centre zone applies to a large number of small centres throughout Auckland. The centres are located in areas of good public transport. The zone provides for the local convenience needs of surrounding residential areas, including local retail, commercial services, offices, food and beverage, and small-scale supermarkets. Large-scale commercial activity is discouraged. Provisions allow for buildings up to four storeys high, enabling residential use at upper floors. The Neighbourhood Centre zone applies to single corner stores or small shopping strips located in residential neighbourhoods. They provide residents and passers-by with daily retail and commercial service needs. Buildings up to three storeys high and with residential use at upper floors are permitted. Development is expected to be in keeping with the surrounding residential environment.

There are increases proposed, in the scale of buildings and intensity of activities in the centres. There is to be a high quality urban and built form amenity, and the centres are anticipated to provide for substantial residential and employment activity and economic

growth. They will also be significant places for social and community facilities and interaction.

#### 4.4 Auckland Plan

Metropolitan centres are identified in the Auckland Plan [Table 10.3] as providing “*a diverse range of shopping, business, cultural, entertainment and leisure activities, together with higher-density residential and mixed-use environments. They have good transport access and are served by high-frequency public transportation. These centres have the greatest opportunities for additional business and residential growth.*

Town centres are identified in the Auckland Plan as: “*local hubs for communities, providing a wide range of retail and business services and facilities, and community facilities. They are generally accessible by frequent public transport services, and provide a range of residential living options, including mixed-use and higher-density options. They have variable capacity for accommodating new residential and business development”.*

Local and neighbourhood centres are identified in the Auckland Plan as being:

“*A focus for a community and provide a range of convenience shops and small business services together with some community facilities. These centres are focused on walkable catchments supported by public transport services. They have variable capacity for accommodating new residential and business development, but to a lesser extent to town centres, due to their individual and accessibility constraints (local centres)”;* and Providing day-to-day convenience shopping within walkable neighbourhoods.

*Based on a small group of shops, they may also be aligned with a community facility, such as a school.” (neighbourhood centres).*

#### 4.5 Current Objectives, Policies, Rules and Methods

The operative Auckland Council District Plan has a range of objectives, policies, rules and methods across the different plan sections (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Centre and Auckland City Isthmus) and all include policy approaches with a hierarchy of commercial centres, from the CBD down through sub-regional, town and local or village centres. All legacy councils had changed the district plans to begin to give effect to the RPS directions on growth, particularly in centres. The terminology differs across the plan sections, and the rules vary from area to area, and some areas had advanced area planning for centres and urban design guidance initiatives to improve the quality of the built environment in centres.

#### 4.6 Information and Analysis

Document	Purpose/Description	Date	Appendix
Case law - centres and commercial activity		-	3.4.1
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Draft Auckland Plan –</i>	Analysis of centres strategy, hierarchy and	2011	3.4.5

<i>Technical Report: Centres and Corridors</i> Auckland Council	criteria		
<i>Prioritising Centres</i> Auckland Council	Summarises the analysis of 80 centres across the Auckland region to aid the process of prioritising sustainable compact centres.	2011	3.46
<i>Capacity for Growth Study</i> Auckland Council	Report on residential, business and rural land availability in Auckland	2012	3.4.8
<i>Auckland Retail Economic Evidence Base</i> Fairgray, S RIMU Auckland Council	Existing retail distribution, and region-wide retail supply-demand balance	2013	3.4.9

Consultation was undertaken with the Retailers group, and built on the ‘centres plus’ approach to retail distribution and the strategic and functional role of centres in Auckland. In the policy and centres zones and their rules there is substantial physical capacity for further intensification. This would be comprised of retail, commercial and residential activity, as well community and other social infrastructure and recreation activities, some complementary and some competing for space.

The centres and their policy structures are built on the legacy regional and district plan approaches developed through the operative Auckland Council RPS and as reflected in the Auckland Plan. As such there is not a significant policy change except for its implementation of the regional policy direction, intended greater consistency across Auckland’s centres and their hierarchy, and some substantial increases in the intensity of business and residential activity that can occur in centres.

#### **4.7 Consultation Undertaken**

See Appendix 3.39.2.

#### **4.8 Decision-Making**

See Appendix 3.39.3.

#### **4.9 Proposed Provisions**

The provisions seek to ensure that despite the individual set of conditions and dynamic role of each centre, there is an ability to apply policy provisions appropriate to enhancing the opportunities that exist within each generic grouping of centres. Such an approach provides for the ability to:

- Recognise the substantial function and role provided by metropolitan centres as effectively sub-regional centres with substantial multi-community catchments, as well as significant private and public infrastructure investment.
- Identify town centres as largely the traditional district centres that are anchored by one or two supermarkets, and typically one or two large format retailers or department stores as well as supporting community facilities and social services. Such centres typically provide a focal point for the adjoining community, with surrounding opportunities for residential intensification.
- Acknowledge the important, largely convenience, role of local and neighbourhood centres which are a focus for a community and provide a range of convenience shops and small business services together with some community facilities. These centres are focused on walkable catchments

supported by public transport services. They have variable capacity for accommodating new residential and business development, but to a lesser extent than town centres, due to their individual and accessibility constraints (local centres) and providing day-to-day convenience shopping within walkable neighbourhoods. Based on a small group of shops, they may also be aligned with a community facility, such as a school (neighbourhood centres).

#### **4.10 Reference to other Evaluations**

Refer Section 2.10 above.

## 4.11 Objectives, Policies and Rules

### 4.11.1 Objectives

The following objectives are proposed for each type of centre:-

#### **Objectives**

##### *Metropolitan Centres*

*1. A network of metropolitan centres are developed, that are second only to the City Centre in terms of diversity, scale, form and function, and which are the sub-regional focus for commercial, residential, community and civic activities.*

##### *Town Centres*

*1. A network of town centres that are the focus of commercial, residential, community and civic activities for the surrounding area.*

##### *Local Centres*

*1. A network of local centres that enable commercial activity which services local convenience needs and provides residential living opportunities.*

##### *Neighbourhood Centres*

*1. Commercial activities within residential areas, limited to a range and scale that meets the local needs of residents as well as passers-by are provided in neighbourhood centres.*

#### **Appropriateness**

The objectives identify the centres hierarchy and distribution of activities as commensurate with the scale and intensity of the centre itself and its nexus with surrounding residential intensification opportunities and transport integration. Such an approach:

- Assists in planning for an equitable spread of centres and services across the region. It is particularly helpful in the consideration of retail activities, and the extent to which communities have equal access to retail services and facilities, thereby enabling people and communities to be able to further their social, cultural and economic well-being.
- It also helps in the consideration of where to locate social and community activities as well as public and private investment, thereby sustaining the resources to meet reasonably foreseeable needs as well as managing the use, development and protection of such physical resources.
- The hierarchy can be adapted as circumstances change;
- It recognises that Auckland is made up of different sized building blocks and that communities tend to have a cellular construction to them, with cells combining together to form larger wholes – street – neighbourhood – suburb – city – region, as ‘nested centres’, and reinforces the urban form as one of a compact city through seeking to encourage appropriate scales and diversity of development foremost into the centres network, managing the use and development of physical resources and avoiding adverse effects associated with a more dispersed approach.

The objectives do not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems, nor health and safety.

The objectives are also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources.

S7(ba) through minimising trip generation by agglomerating, in particular commercial activities within metropolitan and town centres.

S7(g) in that the objectives seek to provide for the efficient use of buildings, land and infrastructure in centres.

S7(c) and s7(f) as the objectives are determinative on the basis of agglomerating similar activities so as to maintain amenity values and the quality of the environment.

The objectives are useful in that they recognise the value of centres, extending beyond just the distribution of commercial activity but also as key focal points for surrounding communities of interest, within a spectrum of providing for local convenience needs to sub-regional

catchments that spread across large tracts of Auckland.

The objectives provide considerable certainty to business owners, community providers, and the wider community as to the role and function of each centre within the hierarchy.

The hierarchy network provides policy value in that it seeks to:

- Reinforce greater self-containment and self-sufficiency at the larger centre scale;
- Produce viable local economies that support strong connections and commensurate extent and intensity of residential activity;
- Enable a reduction in vehicle kilometres travelled by shoppers and more non-vehicle travel patterns to emerge;
- Efficiently relate to centre location within a broader hierarchy of centres and also the geographic distribution and integration with the transport network.

The objectives are achievable with the Unitary Plan providing for a hierarchy of centre (and business zones) and providing for a spectrum of commercial, community and residential activity, scale and intensity within each, essentially recognising that the larger the centre the higher the functional amenity and benefits to the community of interest (catchment), in this way a centres-hierarchy is established and specific provisions are applied to maximise the diversity of activity as commensurate with the surrounding catchment, and the need to ensure the integration of such business zones with adjoining land uses.

### **Objectives**

*Metropolitan centres*

*2. Key retail streets are the focal point of pedestrian activity, with identified general commercial streets supporting this role.*

*Town centre*

*2. The scale and intensity of development in town centres is increased while ensuring development is in keeping with the centre's planned future character.*

*Town centre*

*3. Key retail streets are the focal point of pedestrian activity, with identified general commercial streets supporting this role.*

*Local centres*

*2. The scale and intensity of development within local centres respects the planned character*

### **Appropriateness**

Commercial centres are dynamic and have continual pressures placed upon them. These pressures can drive centres to expand in response to demands for new development and larger structures, or to redevelop within existing boundaries, or in some cases to decline as socio-economic trends or lack of investment run against them. As these processes take place, it becomes important to improve centres, notably larger metropolitan and town centres with respect to their design, layout, operation, appearance and appeal. The objectives seek to provide for people and communities to further their social, cultural and economic well-being. This is primarily through ensuring quality built form within commercial zones, through which such needs can be met, acknowledging that there is a spectrum of scale and intensity from large scale and dominant metropolitan and town centres, to those centres (local and neighbourhood) where the amenity should reflect and be compatible with the planned future character of surrounding areas.

To maintain and enhance such values, there will be a need to avoid, remedy or mitigate adverse effects. This requires consideration of how to address scale and form of business activity, implications of trip generation, and the ability to minimise specific adverse effects that could otherwise be associated with poor design or reduced aesthetic outcomes associated with ongoing development. Such an approach also includes the necessity to manage effects that may impinge on health and safety, such as contamination, pollution, odour, hazardous substances, noise and glare.

Maintaining and enhancing amenity and character values requires ongoing commitment by both the council in terms of investment in the public realm, and developers in terms of private investment. Such an approach helps to sustain associated resources to meet reasonably foreseeable needs.

*of the surrounding environment.*

*Neighbourhood centres*

*2. Neighbourhood centres are developed to a scale and intensity that respects the future planned character of the surrounding environment.*

A continuation of the theme of recognising and reinforcing the role of centres as focal points relates to ensuring that the distribution of activity considers infrastructural constraints, urban growth, and the potential nuisance and quality effects of business operations, and hence managing the use, development and protection of ... physical resources, sustaining the potential of physical resources to enable well-being.

In terms of sustaining the resources to meet reasonably foreseeable needs, such an approach requires a balancing of methods to ensure that sufficient capacity is provided, through zoning, to ensure that centres can expand and intensify as their role and function increases. Conversely, rules are also needed to ensure that preferred in-centre activities are not unduly stifled through strict design requirements. Adequate opportunity also needs to be provided to relocate from centres those activities which may have considerable opportunity costs to the establishment of finer grain and designed centre activities.

The objectives are also considered in accordance with the following principles of the Act:

S7(b) in that the objectives seek to promote certainty in the continued use of natural and physical resources represented by the centre network.

S7(ba) reinforcing centres as focal points in conjunction with adjoining intensified residential use provides for improvements in transport modal choice and reduced trip generation.

S7(g) in that the objectives seek to provide for the efficient use of buildings, land and infrastructure in existing centres.

S7(c) and s7(f) as the objectives specifically identify a benchmark for a desired level of amenity values and the design quality of these environments.

The objective is useful and reasonable in that it recognises that functional amenity is closely related to centre scale, and also correlates to higher levels of amenity. In that the diversity and extent of well-being increases across the spectrum from neighbourhood centres to metropolitan centres.

In neighbourhood centres, well-being is gained primarily from access to a range of convenience goods in nearby and familiar surroundings where the locality's amenity values remain predominantly residential in character. Access is relatively unconstrained by transport options for most immediate residents. This is reflected in the objective, which seeks an outcome which embeds a scale and character representative of the surrounding environment, with corresponding provisions to limit height, formation of larger format outlets, and the scale of supermarkets accordingly.

Town centre well-being is gained in a variety of ways. Major convenience stores anchor a large variety of retail activities, supporting comparison shopping, socialising and leisure venues. Many include enclosed malls which offer controlled environmental conditions and relatively high degrees of social interaction. Many are surrounded by opportunities to increase residential density and provide employment, and are supported by major public transport initiatives.

At the upper end of the scale, in metropolitan centres, well-being is gained through the greatest variety of contributions from access to comparison shopping as well as leisure offerings (i.e. cafes and bars); access to a wide range of government services; access to major public facilities (such as service centres, galleries) and historical sites, and also where the provision and design of public open spaces has long been the focus of council attention and investment. Accordingly, at this tier the objectives seek to provide for the greatest scale and diversity and intensity of activity, but with proportionate requirements for quality urban design.

The objectives are achievable in seeking to implement a centres hierarchy, the Unitary Plan recognises and provides for expanding and increasing the density of centres, as well as appropriately providing for a diverse range of activities (retail, social and community, employment and residential), as well as recognising that there is an appropriate balance between high quality design outcomes, centre functionality and individual activity operational and functional requirements.

#### **4.11.2 Policies**

##### Function and Capacity

These provisions can be considered collectively as generally containing the following policy provisions.

**Metro:** Policies 1, 2, 3, 4, 5, 6 and 9

**Town:** Policies 1, 2, 3 and 6

**Local:** Policies 1, 3, 4 and 5

**Neighbourhood:** Policies 1, 3, and 4

These provisions collectively seek to create an enduring network of commercial centres in accommodating future population, commercial development, social well-being delivery, transport initiatives and employment growth. However, the role, function and growth potential of each centre varies. This requires recognition of the pre-eminent role of the city centre as the commercial hub for the City, the network of sub-regional metropolitan centres, and town centres as hubs for wider sub-regional communities, with local and neighbourhood centres being identified as lesser order centres recognising their anticipated limited scale and provision of well-being.

##### Design

These provisions can be considered collectively as generally containing the following policy provisions.

**Metro:** Policies 6, 7, and 9

**Town:** Policies 4, 5 and 6

**Local:** Policy 2

**Neighbourhood:** Policy 2

These provisions collectively seek to ensure a design and amenity response commensurate to the role, function and scale of each centre in the hierarchy.

##### Transport

These provisions can be considered collectively as generally containing the following policy provisions.

**Metro:** Policy 8

**Town:** Policy 2

**Local:** Policy 4

### ***Neighbourhood: Policy 4***

These provisions collectively seek to ensure the safe and efficient operation, and integration with the transport network.

#### **4.11.3 Rules and other methods**

The proposed provisions are summarised in 4.9 above.

##### **Metropolitan Centre**

The zone provides for a wide range of activities including commercial, leisure, high-density residential, tourist, cultural, community and civic services. Zone provisions, in conjunction with rules in the other business zones, reinforce metropolitan centres as locations for all scales of commercial activity.

Precincts and overlays, that modify the underlying zone or have additional provisions, apply to some of the metropolitan centres. Generally, however, to support an intense level of development, the zone allows for high-rise buildings.

Some street frontages within the zone are subject to a Key Retail Frontage or General Commercial Frontage overlay. Key retail streets are the focal point of pedestrian activity within the centre. General commercial streets play a supporting role. Development fronting these streets is expected to reinforce this function. Rules for the overlay are incorporated in the zone rules.

Buildings within the zone require resource consent to ensure that they are designed to a high standard, which enhance the quality of the centre's streets and public open spaces.

##### **Town Centre**

The zone provides for a wide range of activities including commercial, leisure, residential, tourist, cultural, community and civic services. There is a range of possible building heights depending on the context. Provisions typically enable buildings of between four and eight storeys, although there may be special circumstances where other building heights are appropriate. Increased height within the centres will facilitate increased office and residential living opportunities at upper floors.

Factors influencing this include proximity to the city centre, metropolitan centres and larger town centres, where buildings up to six storeys in height are permitted. In other areas where the zone applies, buildings up to four storeys are permitted.

Some street frontages within the zone are subject to a Key Retail Frontage or General Commercial Frontage overlay. Key retail streets are the focal point of pedestrian activity within the centre. General commercial streets play a supporting role. Development fronting these streets is expected to reinforce this function. Rules for the overlay are incorporated in the zone rules.

Building within the zone requires resource consent in order to ensure that they are designed to a high standard that enhances the quality of the centre's streets and public open spaces.

##### **Local Centre**

This zone applies to a large number of small centres throughout Auckland. The centres are located in areas of good public transport.

The zone provides for the local convenience needs of surrounding residential areas, including local retail, commercial services, offices, food and beverage, and smaller-scale supermarkets. The zone discourages single large-scale commercial activity that would

prevent a mix of activities within the local centre. The expansion of local centres may be appropriate if it provides greater social and economic well-being benefits for the community. Provisions allow for buildings up to four storeys high, enabling residential use at upper floors.

New development within the zone requires resource consent so that it is designed to a high standard which enhances the quality of the centre's streets and public open spaces.

#### Neighbourhood Centre

This zone applies to single corner stores or small shopping strips located in residential neighbourhoods. They provide residents and passers-by with daily retail and commercial service needs.

Buildings up to three storeys high and with residential use at upper floors are permitted. Development is expected to be in keeping with the surrounding residential environment.

#### Function and Capacity

##### **Methods**

- (i). Rules and activity tables for activities within the commercial network centres as these relate to the extent, type and scale of commercial (retail and office activities). Limitations on scale at neighbourhood and local centre level.
- (ii). Assessment criteria.
- (iii). Area plans, centre plans, precinct plans.
- (iv). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### Design

##### **Methods**

- (i). Rules and activity tables for activities within the commercial network centres as these relate to the extent, type and scale of commercial (retail and office activities). Limitations on scale at neighbourhood and local centre level.
- (ii). Assessment criteria.
- (iii). Area plans, centre plans, precinct plans.
- (iv). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

The assessment repeats the costs and benefits evaluation provided for the Amenity, Design and Nuisance provisions as these relate to the provisions in 3.12 above, and for the sake of conciseness is not duplicated here.

#### Transport

##### **Methods**

- (i). Rules and activity tables for activities within the commercial network centres as these relate to the extent, type and scale of commercial activity.
- (ii). Assessment criteria – Transport and design of car parking, access and servicing.
- (iii). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### **4.11.4 Costs and Benefits of Proposed Policies and Rules**

Refer to Table 3 below for the environmental, social, economic and cultural costs and benefits of the policies/ rules.

#### **4.11.5 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed policies and methods.
- The evidence base and supporting information enables informed and transparent decision making.

- The risk of not acting is that the proposed policies and rules are required for sustainable management.

#### **4.12 Alternatives**

Alternatives are:

1. Preferred
2. Status quo
3. Providing a three tiered approach of local centres – district centres and city centre
4. A liberal approach

The proposed preferred alternative is discussed in 4.9 above. The status quo alternative is outlined in 4.5 above.

#### **Alternative Three – Providing a three tiered approach of local centres – district centres and city centre.**

A more horizontal centres hierarchy as it relates to the centre network, being essentially:

- convenience centres (local);
- comparison and larger scale centres (district); and
- the city centre

is not considered to be nuanced enough to implement the regional level provisions, Issue 1.1 ‘Enabling Quality Urban Growth’ or the regional level provisions in Part 2.2. of the RPS.

As identified, centres are dynamic and exist on a spectrum as to the degree and extent of functional amenity and associated scale they provide to supporting communities. There is also a substantial spectrum within those centres that provide a mix of comparison retail, social activity and associated amenity.

A less-nuanced approach would fail to recognise and provide for centres at the sub-regional level (metropolitan) that will continue to increase their social / leisure offer as a point of difference, this is also likely to include amenity improvement, urban design and improved public transport interchanges as such centres become effectively the ‘centre’ for their respective quadrants of Auckland. Also recent infrastructure commitments to motorway improvements, such as the completion of the north-western ring-road route which will culminate in the final required link the ‘Waterview Connection’ in 2016 will significantly change the travel patterns of Aucklanders within the city. Previously more internalised suburbs will become linked and have greater ability to travel greater distances on the motorway, impacting on where people live, work and shop.

However, other district centres not able to expand to achieve such a critical mass may find their role and function in terms of general merchandising and comparison retailing maintained, but not necessarily expanded. Many smaller district centres have experienced a decline in mainstream retail activity, offset to a degree by the increase in convenience food outlets, community based and second hand outlets, non-retail and professional service activity.

The costs of not recognising the role and function of these tiers within a centres hierarchy provides less certainty to the community, the council and business owners as to the correlation between centre scale and function, and associated endeavours to increase capacity and link with urban form objectives relating to efficient transport provision and residential intensification. These outweigh the benefits in terms of providing a less prescriptive policy approach to the role of such centres as focal points, The table below provides a policy response.

#### **Alternative Four – A liberal approach.**

This approach would enable business activity to establish in any business zone within Auckland, at any scale, provided adverse effects on the immediate environment are not significant. The market would then need to address matters of infrastructure, and social well-being.

Such an approach would not recognise and provide for the efficient use and agglomeration of industrial activities, all with a similar form and character and the ability to internalise their effects without causing nuisance to more sensitive activities. Accordingly, such an approach would provide for a disjointed range of activities without providing any strategic overview as to the efficient provision and integration of infrastructure, as well as avoiding reverse sensitivity effects between activities. Accordingly, the health and safety of the community would not be provided for, neither would adverse effects be avoided, remedied or mitigated.

The approach would also foster a wide range of non-industrial activities within industrial and business zones, leading to a potential increase in land values, and the potential for significant distributional effects on existing commercial centres. At a certain point the price of land may well make it difficult for industrial activities to compete and locate in traditional industrial zones. This would place pressure on the Auckland Council to find alternative new locations to provide for industrial purposes with associated costs to the community in terms of funding unanticipated network infrastructure and requiring mitigation of any environmental effects associated with locating new industrial zones in sub-optimal locations. Accordingly, such an approach would not achieve the reasonably foreseeable needs of people and communities associated with the district in terms of providing for their well-being.

The table below discusses each alternative compared to the proposed alternative.

**Table 3**

	<b>Preferred Alternative</b>	<b>Status Quo Alternative 2</b>	<b>Alternative 3 Description – A horizontal centres hierarchy of:</b> → convenience centres (local); → comparison and larger scale centres (district); → and the city centre	<b>Alternative 4 – A liberal approach</b>
Appropriateness	<p><b>Description: Centres hierarchy – establishing role and function</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving the objectives.</p> <p><b>Description: Transport policies – centres Hierarchy</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving the objectives.</p>	The operative Auckland Council District Plan has a range of objectives, policies, rules and methods across the different plan sections (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Centre and Auckland City Isthmus) and all include policy approaches with a hierarchy of commercial centres, from the CBD down through sub-regional, town and local or village centres. All legacy councils had changed the district plans to begin to give effect to the RPS directions on growth, particularly in centres. The terminology differs across the plan sections, and the rules vary from area to area, and some areas had advanced area planning for centres and urban design guidance initiatives to improve the quality of the built environment in centres. The proposed Unitary Plan takes this approach further and provides greater Auckland-wide consistency.	The approach whilst achieving the objectives (i.e. a liberal approach), would not find overall support in Part 2 of the Resource Management Act.	The approach whilst achieving the objectives (i.e. a liberal approach), would not find overall support in Part 2 of the Resource Management Act. Efficiency of public infrastructure provision would likely be unsustainable, and economic and social well-being would be optimised for fewer people.
Effectiveness	<p><b>Description: Centres hierarchy – establishing role and function</b> Auckland has a well distributed network and hierarchy of centres. Within each level of centre there are existing social, recreational, community, transportation facilities and services, alongside retail and commercial activities. The benefits of a diversity of activities and facilities relates to the scale of the centre and the number of people that visit it. The advantages of having all these activities together and expressed as a hierarchy is that people tend to converge on one location to access goods and services, health and community needs, recreational and social activities, and they have the ability to take public transport, walk or cycle. Infrastructure and services can then be used efficiently and planned for well in advance. The extent of these activities (functional amenity), residential densification opportunities, and transport improvements can be linked in policy terms providing greater certainty to people and communities, and seeking to achieve a compact urban form.</p> <p>The policies and their methods (and rules) is considered to be effective.</p> <p>The application of a centres hierarchy is differentiated in terms of the function and role anticipated within a specific centre, and hence the provisions applied. The provisions identify the basis by which amenity and character can be maintained and enhanced within the commercial centre network but also identifying where the greater concentrations of activities are sought. Such an approach provides certainty and long term investment in the physical resources represented within the commercial centres, as well as those zones that adjoin these areas.</p> <p>The approach also assists in terms of accommodating changing patterns and demand in</p>	The proposed Unitary Plan modifies the status quo approach to more clearly define the hierarchy of centres and support their role and functions in economic growth and employment and retail distribution.	The approach would not be effective in that does not provide sufficient guidance as to the anticipated role and function of specific centres, and the amenity and design considerations accordingly.	The approach would not be effective in that does not provide sufficient guidance as to the anticipated role and function of specific centres, and the amenity and design considerations accordingly.

	<p>commercial activity, including:</p> <ul style="list-style-type: none"> <li>(a) The centres where expansion will be necessary to accommodate growth;</li> <li>(b) Those centres where promotion of function to a higher level in the hierarchy will better match with the existing network of commercial centres and population growth.</li> </ul> <p><b>Description: Transport policies – Centres Hierarchy</b></p> <p>The approach directs the centralisation of traffic patterns based on concentrating activity commensurate within each tier of the centres hierarchy. Such an approach is effective and proactive in that it provides for the ability to reduce trip generation and also focus's mitigation packages to central locations.</p> <p>Consequently, by operating a hierarchical centres model, traffic movements will of necessity be focused around the centres (particularly the higher order centres at the metropolitan and town centre tier). The effect will be to intensify traffic in those areas but at the same time reduce the traffic impact on other sections of the roading network. There are thus significant advantages in terms of overall trip miles and traffic generation to be gained in one area – with resultant assessment matters to consider and provide mitigation to significant generators. The aim is that overall a better result is achieved. As a whole the transport network is 'better off'.</p> <p>Reduced trip generation is also assisted through ensuring that there is a well distributed range of Neighbourhood and local centres that provide for convenience goods and services within close proximity to their demand, and hence accessible by a range of transport modes.</p>			
Efficiency	<p><b>Description: Centres hierarchy – establishing role and function</b></p> <p>Maintaining an appropriate scale of development consistent with the centre hierarchy provide for a regulatory approach with the least costs. This is achieved in terms of providing a framework for accommodating commercial activity, but with the greatest benefits in terms of providing certainty of infrastructure in physical resources, and meeting the well-being needs of people and communities.</p> <p>A centre hierarchy is fluid and dynamic; however seeking to provide hierarchical policy for urban centre structure to determine (and plan for) the role and function of centres, including their geographic extent and mix of activities (centres, especially at the higher order levels where seeking a functional amenity and diversity of activity needs to extend beyond a diversity of convenience and comparison retail) promotes considerable certainty and efficiency as to the environmental outcomes anticipated.</p> <p>The approach to set tangible expectations in terms of the anticipated role and function of centres is the most appropriate means by which to implement the objectives.</p> <p><b>Description: Transport policies – Centres Hierarchy</b></p> <p>The approach provides for efficiencies in terms of targeting transport network investment, as well as modal split, reduced traffic generation (given cross shopping increases), and public transport. The bigger gains in terms of investment efficiencies are represented at the metropolitan and town centres tiers, community efficiencies are provided by having a 'nested' approach to commercial and social provision, with accessible centres providing for convenience needs, and more distant but aggregated centres providing for a wide range of functional amenity and cross shopping opportunities as accessible by an efficient public transport network.</p> <p>The approach is the most appropriate means by which to implement the objectives.</p>	<p>The proposed Unitary Plan modifies the status quo approach to more clearly define the hierarchy of centres and support their role and functions in economic growth and employment and retail distribution, seeking greater efficiency in the plan provisions, and also in the scale and intensity of business activity in centres.</p>	<p>This option can be implemented at a major cost, principally in relation to reduced ability to link and integrate the scale of specific centres with urban form considerations as these relate to public and private spending, residential intensification opportunities and public transport initiatives. The market would take initiatives and achieve efficiencies, but the public investment would lack integration and become devalued. Wider strategic objectives would not be met.</p>	<p>This option can be implemented at a major cost, principally in relation to reduced ability to link and integrate the scale of specific centres with urban form considerations as these relate to public and private spending, residential intensification opportunities and public transport initiatives. The market would take initiatives and achieve efficiencies, but the public investment would lack integration and become devalued. Wider strategic objectives would not be met.</p>
Costs	<p><b>Description: Centres hierarchy – establishing role and function</b></p> <p><b>Social</b></p> <p><i>to the community:</i> Concentrates congestion into a network of key nodes, which may disrupt transport patterns / efficiency of those not seeking in-centre activities.</p> <p>- (Limited) reduction in functional amenity opportunities at the local and neighbourhood level.</p> <p>- Some (anticipated) increase in interface nuisance implications adjoining higher order centres.</p> <p><i>to the council:</i> No material costs are anticipated from these policies.</p> <p><i>To business owners:</i> No material costs are anticipated from these policies.</p> <p><b>Economic:</b></p>	<p>Costs of the status quo approach are similar to those of the preferred alternative. The status quo has a less clearly-defined hierarchy of centres and cannot support their role and functions in economic growth and employment and retail distribution to the extent that the preferred alternative can. Benefits of the status quo would be</p>	<p>Difficult to provide for nuanced provisions that adequately provide for the scale and range of activities that could be anticipated, and the likely adverse effects anticipated at the interface.</p> <p>Reduced certainty as to the extent of private and public investment in infrastructure within centres.</p>	<p>This option can be implemented at a major cost, principally in relation to reduced ability to link and integrate the scale of specific centres with urban form considerations as these relate to public and private spending, residential intensification opportunities and public transport initiatives.</p>

	<p><i>to the community:</i> (Limited) reduction in employment diversity opportunities at the local and neighbourhood level.</p> <p><i>to the council:</i> Administration costs associated with lack of flexibility for developing local and neighbourhood centres.</p> <p>-(limited) Pressure to manage transition / fund amenity improvements where local and neighbourhood centres fail to attract ongoing investment.</p> <p>Mitigation measure and public transport initiatives at higher order centres in order to reduce transport network congestion.</p> <p><i>To business owners:</i> Restrictions in opportunities for business diversity and investment within local and neighbourhood centres / less enabling for larger scale business activities.</p> <p>-Some retail outlets have difficulty / inappropriately being located within a centre, regardless of where in the hierarchy.</p> <p><b>Environment:</b> Blanket requirements can reduce opportunities for land developments particularly at lower order centres, reducing investment and potentially delaying amenity improvements.</p> <p>Position in the hierarchy does not confer certainty over size. Some town centres are as big as metropolitan centres, leading to confusion as to the demarcation between tiers in the hierarchy.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Description: Transport policies – centres Hierarchy</b></p> <p><b>Social</b></p> <p><i>to the community:</i> Some potential (limited) for roads to be congested and have some inter-modal conflicts as concentrated around centres.</p> <p>-In some instances decreased parking opportunities.</p> <p><i>to the council:</i> No material social costs</p> <p><i>To business owners:</i> No material costs are anticipated from these policies.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> No material economic costs.</p> <p><i>to the council:</i> Increased administration costs.</p> <p>-Mitigation measures and public transport initiatives at higher order centres in order to reduce transport network congestion.</p> <p><i>To business owners:</i> Reduction in parking may result in decreased usage / profitability, and / or incumbent developments car parking being used to serve new developments.</p> <p><b>Environment:</b> The rule provisions treat high traffic generators on an individual basis, and there may be the potential for clustering of traffic generators which could still have unmitigated impacts on the road network.</p> <p>-Can create congestion at centres.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p>	<p>considered under-achieved.</p> <p>Less certainty and ability to integrate the centres with: community services and facilities, higher density residential development, multi-modal transport options.</p> <p>Increased administration costs due to prescriptive provisions</p>	
Benefits	<p><b>Description: Centres hierarchy – establishing role and function</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Those living along the interface / transitional areas adjoining all commercial centres will have greater certainty as to residential amenity expectations, as commensurate with the opportunities for increasing residential densities.</p> <p>-Greater employment diversity and opportunities as associated with the proximity of residential intensification to higher order centres.</p> <p>-Link between the distribution (and spectrum) of centres and providing for the City's social needs, i.e. the larger the scale of the centre the greater the functional amenity.</p> <p>-Increases choice and number of locations to access goods (and services); will result in community wide reduction in travel distance and time for some households to specific commercial opportunities.</p> <p>-May improve work based convenience shopping opportunities.</p> <p>-Improved certainty for social infrastructure providers (including Schools, Government departments).</p> <p><i>to the council:</i> Explicit link between centre hierarchy and societal expectations as to amenity and social facilities.</p> <p><i>to business owners:</i> No material social benefits.</p>	<p>The proposed Unitary Plan modifies the status quo approach to more clearly define the hierarchy of centres and support their role and functions in economic growth and employment and retail distribution, seeking greater efficiency in the plan provisions, and also in the scale and intensity of business activity in centres. Benefits of the status quo would be considered under-achieved.</p>	<p>Recognises that there is a wide range of centres emerging, and not all of them can easily be differentiated into specific classification, therefore a generic 'district centre' category provides a useful catch all</p> <p>Some of the benefits of market-attractive centres will be realised, but there will also be market opportunities away from centres that will be taken up, by dispersed development.</p>

	<p><b>Economic:</b>  <i>to the community:</i> Improved amenity and functioning of the centre reduces likelihood of centre decline.  -Decrease of amenity degradation at transitional boundaries as a proxy indication of reduction in housing economic value.  <i>to the council:</i> Increased certainty in linking capital investment expenditure (social facilities, amenity improvements) to a recognised hierarchy of centres and likely efficiency of investment.  -Explicit link between centre hierarchy and residential intensification, and nexus with achieving a compact urban form.  -<i>to business owners:</i> Improved amenity and functioning of a centre is likely to have flow on effects to customer usage and may improve profit margins.  -Increased certainty in terms of the physical resources associated with business activity within commercial centres, given the design and quality focus associated with redevelopment and consolidation of activities within the centre.  -Identification and application of differentiated provisions regarding the outcomes anticipated within Precincts provides certainty to the council and developers as to the outcomes sought from investment in these areas.  -Maximum building height (as identified within the centre Hierarchy) provides opportunities for flexible building development, although this is tempered in that opportunities are somewhat constrained by existing physical resources and cadastral boundary configuration.</p> <p><b>Environmental:</b> Ensures the intensification / expansion of existing centres are not at the expense of their respective function and amenity.  -Addresses cumulative effects of in-centre activity as related to the anticipated scale, role and function of each tier of the centres hierarchy.  -Seeks to link centre intensification with transport initiatives and residential intensification opportunities. Assists in achieving a compact urban form.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Description: Transport policies – centres Hierarchy</b></p> <p><b>Social:</b>  <i>to the community:</i> Centre network is consolidated to support higher frequency public transport, and modal choice.  -Recognition and provision for distribution that provides for highly distributed and accessible local and neighbourhood network, reducing trip generation.  <i>to the council:</i> No material social benefits  <i>to business owners:</i> No material social benefits.</p> <p><b>Economic:</b>  <i>to the community:</i> Creates efficiencies in terms of trip generation and journeys.  <i>to the council:</i> Ability to strategically plan for, and provide transport network initiatives to reduce congestion, provide PT or mitigate consolidated commercial activity.  <i>to business owners:</i> (Limited) reduction in the extent of car parking necessary given the likely agglomeration benefits from clustering commercial activity within tiers of the hierarchy.</p> <p><b>Environmental:</b> Provides a better transport network overall than a more dispersed approach.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>			
Risks	<p><b>Description: Centres hierarchy – establishing role and function</b>  The key risk is that the role and function of centres in the hierarchy is dynamic, and also that there are a wide range of centres emerging that are outside the logic of the hierarchy. These risks are lessened through recognition that the centres hierarchy is able to be amended through a plan change process, and that areas where there are agglomerated 'centre-type' activities are recognised and provided for in the UP (including the need for such to avoid, remedy or mitigate adverse effects).</p> <p><b>Description: Transport policies – Centres Hierarchy</b></p>	Overall risk of the status quo approach is that it fails to achieve potential, and is unable to provide sufficient opportunity for economic growth.  The key risk is a reduction in Auckland's overall economic competitiveness and an Auckland-	The key risk is an uneven outcome as associated with reductions in a number of centres' competitiveness, due to a number of centres not having a sustained (and substantial) catchment to be able to support considerable increases in scale and function, to the detriment of the achievement of	The main risk is that of market forces moving to new opportunities and discarding sunk cost public investment in centres, with potentially significant consequences for environmental, social and economic well-being.

	<p>The key risk to the approach is the extent by which congestion is not able to be overcome through targeted mitigation or public transport improvements reducing the efficiency of the centre network. There is also a risk to incumbent business owners as to the extent by which the 'private' car parking resource is utilised for cross shopping with associated dis-benefits to the parking provider – this will especially be an issue for existing Mall developments within centres as subject to maximum car parking provisions. This matter is considered separately within the Section 32 documentation.</p>	<p>wide reduction, over time, of social and economic well-being.</p>	<p>wider urban form policies that cement a relationship with middle tier centres to residential intensification and transport integration</p>	
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#### **4.13 Conclusion**

Recognising and differentiating a commercial hierarchy for the City's many centres is important from a development context in terms of providing ongoing confidence. It also, at a policy level, establishes a hierarchy promoting alignment of the role, function and relative importance of the centre/s in terms of the council's strategic and environmental policy for urban form, growth and transport. The approach provides for the ability to apply amenity and character provisions based on the likely anticipated scale and density activity that can be anticipated at each 'tier' in the hierarchy, as well as link together the likely functional amenity expected with increasing residential densities and public transport initiatives. It also provides greater certainty as to the anticipated amenity at the interface with surrounding zones, and the expectations in terms of in-centre design and environmental quality.

## **5 Overview of Section 3.7 Mixed Use zone in zone objectives and policies**

### **5.1 Subject Matter of this Section**

The purpose of Section 3.7 Mixed Use zone objectives and policies (in zone objectives and policies) is to recognise, provide for and manage the district level business distribution issues that relate to the form, distribution and development of mixed use zones as these principally relate to a number of fringe locations surrounding Auckland commercial centres, and provide improved accessibility of residents to shops, public transport, and leisure and entertainment activities, as well as potential employment opportunities. The focus is primarily in terms of providing for a blended zone that allows for finer grain commercial and employment opportunities as well as substantial provision for residential intensification.

Unless well-managed, the mix of activities will not result in quality mixed use environments or result in incompatibilities between activities. The mixed-use zone will provide safeguards for residents, such as controls on urban design, amenity and development related to privacy, access to light, private open space and noise.

Strategic effects on urban form and growth, as well as the viability and role of adjoining centres are to be considered and managed through provisions relating to the range and scale of activities.

The objectives and policies of this Section of the Unitary Plan provide the framework for the management and distribution of activity within the Mixed Use zone.

### **5.2 Resource Management Issue to be Addressed**

Section 3.1 'Enabling Economic Well-being' addresses two resource management issues, they are:

- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well-being;

Enabling Quality Urban Growth (Issue 1) is addressed in a number of ways throughout the Plan and is the subject of a separate s32 consideration. However, with respect to Section 3.7 (Mixed Use zone), the issue seeks to provide direct guidance in objectives and policies in terms of the scale and extent of residential and commercial opportunities, ensure developments remain compatible and focus on a high design quality for Key Retail Streets (objectives 1, 2 and 3 of 3.7). Issue 1.2 (Enabling Economic Growth) is addressed through Objective 1 which seeks to provide opportunities for employment growth in these zones. Six specific policies are set out for these objectives, together with implementation methods for each policy, are set out. These six policies can be grouped as follows:

- 1) Policies that seek to ensure an appropriate distribution of the zone, and ensure its integrity with achieving a compact urban form (policies 1, 2, 3 and 5).
- 2) Policies that seek to provide for intensive residential opportunities (policies 2 and 3)
- 3) Policies seeking to ensure consideration of the environmental qualities of development (policies 4 and 6).

### **5.3 Significance of this Subject**

The creation of the Mixed Use zone in part reflects changes in land use which have already begun to occur. It then expands that to cover wider areas of Auckland, particularly around town and metropolitan centres. The historical changes have included older workshops and commercial buildings, on the fringe of the city and town centres, being converted or redeveloped into intensive residential and mixed use. This zone is typically located around centres and along the rapid and frequent service network. It acts as a transition area, in terms of scale and activity, between residential areas and the city centre, metropolitan and town centre zones. It also applies to areas where there is a need for a compatible mix of

residential and employment activities.

The zone provides for residential activity as well as predominantly smaller scale commercial activity that does not cumulatively affect the viability of centres. It is capable of accommodating substantial quantities of residential and intensive commercial growth.

The City Centre Fringe Office overlay (Section 4.4 of overlay objectives and policies) applies to areas of the Mixed Use zone and Local Centre zone in the fringe area around the city centre. The purpose of the overlay is to enable more efficient land use in commercial areas close to the city centre, where public transport services are excellent. This is achieved by removing the GFA limitation on office activities. It will provide opportunities for substantial office activities in the Mixed Use zone and the Local Centre zone in areas surrounding the city centre, recognising their proximity to the city centre and availability of excellent public transport services.

#### **5.4 Auckland Plan**

To achieve sustainable development, Auckland's continued high population growth needs to be matched to a range of accessible, quality housing and employment choices. The emphasis is on growth in existing and compact urban areas which are served by efficient, safe public transport.

The main area of departure from the Auckland Plan is in the change from a 'centres only' approach to one of 'centres plus', with a recognition of the need for more overall opportunities for business growth, and alternative locations and business typologies. The Mixed Use zone is part of this approach, but is still largely surrounding and extending the business capability of larger centres.

The Auckland Plan directives relevant to Mixed Use include:

- 6.1- *Plan and provide for sufficient business-zoned land and infrastructure to achieve employment capacity targets and improved economic opportunity.*
- 6.2 - *Ensure an efficient and effective regulatory process with strong public – private relationships, and implement a streamlined regulatory process that offers reduced uncertainty around cost, timing and outcome.*
- 6.3 - *Protect, enhance and improve business-zoned areas and business improvement districts.*
- 6.5 - *Develop conditions to promote entrepreneurial development and commercialisation of innovation, building on Auckland's unique advantages.*
- 6.6 - *Support sector precincts and infrastructure development, science and technology parks, and innovation centres for key industries.*
- 6.7 - *Explore all options to enhance Auckland's key economic sectors, including leveraging council-owned land through joint ventures, public-private partnerships, infrastructure assistance and other forms of collaboration.*
- 10.3 - *Focus urban intensification in areas that have infrastructure in place or which can be provided in a timely and efficient manner, and close proximity and good walking access to community facilities, open space, high-frequency public transport, centres and business areas.*
- 10.9 – *Develop and manage business areas to complement centres, without undermining their role and function in the centres' network, and to provide for a diversity of opportunities for business and employment growth.*

#### **5.5 Current Objectives, Policies, Rules and Methods**

Currently, some sections of the operative Auckland Council District Plan include forms of Mixed Use zones, particularly around older town centres. They are also used to provide a buffer at the edges of newer town centres and between suburban residential development and nearby arterial roads or industrial land uses.

#### **5.6 Information and Analysis**

Document	Purpose/Description	Date	Appendix
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Case law - centres and commercial activity		-	3.4.1
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Draft Auckland Plan – Technical Report: Centres and Corridors</i> Auckland Council	Analysis of centres strategy, hierarchy and criteria	2011	3.4.5
<i>Auckland Retail Economic Evidence Base</i> Fairgray, S RIMU Auckland Council	Existing retail distribution, and region-wide retail supply-demand balance	2013	3.4.9

The development of the Mixed Use zone and its provisions was based largely on planning work carried out for the legacy district plans, concentrating on the already more-intensive areas around centres and on some parts of corridors across Auckland.

The Mixed Use zone in part reflects changes in land use which have already begun to occur, including older workshops and commercial buildings, on the fringe of the city and town centres, being converted or redeveloped into intensive residential and mixed use. They are also consistent with planning work carried out by the legacy Councils on transport and land use integration, ensuring development and land use reinforces centres and their walkability, and the frequent public transport corridors connecting them. The Mixed use zone has also been developed to act as a transition area, in terms of scale and activity, between residential areas and the city centre, metropolitan and town centre zones. It also applies to areas where there is a need for a compatible mix of residential and employment activities.

## 5.7 Consultation Undertaken

See Appendix 3.39.2.

## 5.8 Decision-Making

See Appendix 3.39.3.

## 5.9 Proposed Provisions

The zone provides for residential activity as well as predominantly smaller scale commercial activity that does not cumulatively affect the viability of centres. The zone does not specifically require a mix of uses on individual sites or within areas, but buildings should be adaptable so that the uses within them can change over time.

There is a range of possible building heights depending on the context. The standard zone height is four storeys. Greater height may be enabled in areas close to the city centre, metropolitan centres and larger town centres.

Some street frontages within the zone are subject to a Key Retail Frontage or General Commercial Frontage overlay. Key retail streets are the focal point of pedestrian activity within the centre. General commercial streets play a supporting role. Development fronting these streets is expected to reinforce this function. Rules for the overlay are incorporated in the zone rules.

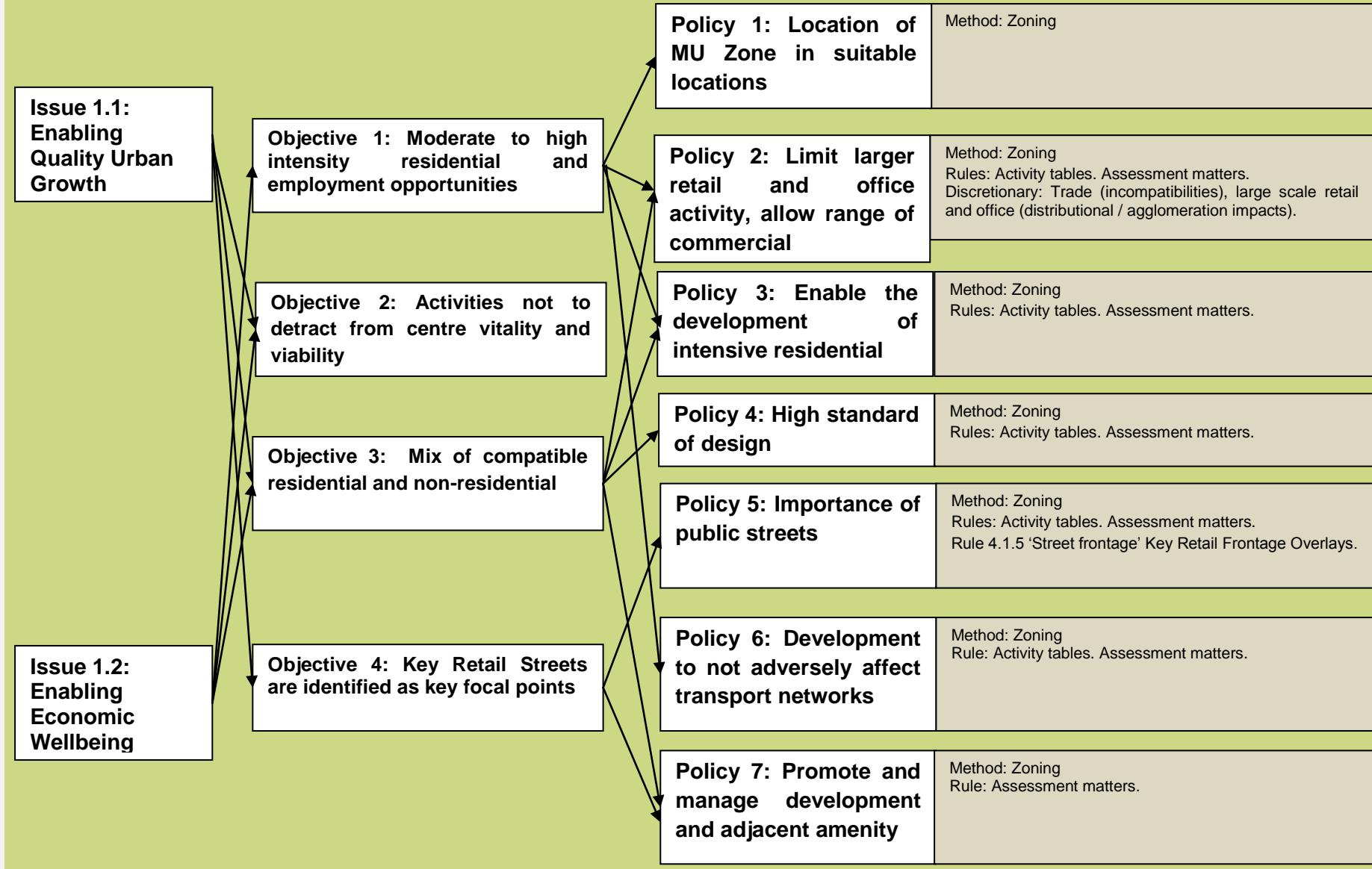
New development within the zone requires resource consent in order to ensure that it is designed to a high standard which enhances the quality of streets within the area and public open spaces.

### **5.10 Reference to other Evaluations**

Refer Section 2.10 above.

The following Figure 8 demonstrates the linkages between the issues and the district objectives and policies.

**Figure 7: Mixed Use Zone objectives and policies**



## 5.11 Objectives, Policies and Rules

### 5.11.1 Objectives

The following objectives are proposed:-

#### **Objectives**

*1. Moderate to high intensity residential and employment opportunities, in a limited number of areas in close proximity to, or which can support the City Centre, Metropolitan and Town Centres zones and the rapid and frequent services network*

*2. Activities within the zone do not detract from the vitality and viability of the City Centre, Metropolitan and Town Centre zones.*

*3. A mix of compatible residential and non-residential activities is encouraged.*

#### *City Centre Fringe Office Overlay Objective –*

*Efficient land use in commercial areas surrounding the City Centre.*

#### **Appropriateness**

The objectives identify the ability to increase residential and employment opportunities in sites close to specific town centres as being optimal because of the non-residential uses that are already present in these situations, and the ability of such areas to accommodate compatible residential and employment densities so as to increase the capacity by which Auckland's urban form can accommodate increased household growth and employment.

Such an approach:

- Assists in planning for identifiable areas of transition between centres and residential areas, where increased densities can be accommodated in a way, or at a rate that enables people and communities to be able to further their social, cultural and economic well-being in terms of residing / working in close proximity to a number of higher order centres.
- Increased density and opportunities for a diverse range of residential, commercial service and small scale office activities provides for the ability to sustaining (the land) resources to meet reasonably foreseeable needs as well as managing the use, development and protection of physical resources as associated with the built form of the area.
- Lastly, the objectives seek to ensure that activities remain compatible, and that in-zone enablement is not at the expense of centre viability and vitality, and hence a compact urban form. Accordingly there is a requirement to recognise and manage any adverse effects of activities on the environment at both a strategic and local level, as well as manage issues associated with health and safety.

The objectives are also considered in accordance with the following principles of the Act:

S7(b) in that the objectives seek to promote certainty in ongoing economic development within the MU zone which will provide for the continued use of natural and physical resources.

S7(ba) there will be limited reduction in trip generation by increasing live-work opportunities, and providing intensive residential opportunities adjoining a number of higher order centres.

S7(g) in that the objective seeks to provide for the efficient use of buildings, land and within the MU zone.

S7(c) and s7(f) as the objective seeks to ensure that activities within the MU zone do not occur at the expense of commercial centre vitality and amenity.

The objectives are useful in that providing for a range of mixed uses within close proximity to centres can:

- protect existing residential activities and intensification potential – which might otherwise be lost to commercial development;
- assist in achieving a compact urban form by allowing residents to be close to new or existing services and facilities;

- provide opportunities for living and working in close proximity, potentially reducing private vehicle use;
- provide work-from-home accommodation that is well connected to commercial areas and their available services;
- allow people to live close to recreation, entertainment and services (reducing the amount of car use or providing further opportunities for those who do not drive);
- provide low-maintenance accommodation opportunities; and
- provide diversity and choice in accommodation type, style and size.

The objectives are achievable with the Unitary Plan providing mixed use development opportunities, by zoning, adjoining a number of centres to provide for increased urban densities in both residential occupation and employment.

### **Objectives**

#### **Objective 4**

*Key retail streets are the focal point of pedestrian activity, with identified general commercial streets supporting this role.*

### **Appropriateness**

Mixed use developments, by their nature and location, encourage a steady flow of foot and/or vehicular traffic to their premises, and also have considerable pass-by trips associated with people and communities accessing the adjoining centres.

Accordingly, it becomes important to consider the environmental quality and amenity of key frontages with respect to their design, layout, operation, appearance and appeal. The objectives seek to provide for people and communities to be able to further their social, cultural and economic well-being, primarily through ensuring a quality built form acknowledging that these environments will not have the same level of public realm focus as the centre network.

Enhancing the quality of the local environment by creating lively populated urban areas, and maintaining and enhancing amenity and character values helps to sustain associated resources to meet reasonably foreseeable needs.

The objective is also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in the continued use of natural and physical resources represented by within the Mixed Use zone.

S7(c) and s7(f) as the objective specifically identifies a benchmark for a desired level of amenity values and the design quality of these environments.

The objective is useful and reasonable in that it recognises that public acceptance and investment of Mixed Use developments is commonly determined by the extent to which a new mixed use development is physically and aesthetically integrated into its context. The objective seeks to focus consideration on the appearance of new developments in terms of their relationship to existing streetscapes, and enhances the quality of the local environment by creating lively, populated urban areas.

The objective is achievable in seeking to create a consistent, yet varied, overall character as these relate to Mixed Use zones, through provisions that seek to ensure appropriate levels of discretion are applied to key retail streets as the focal point of pedestrian activity.

### **5.11.2 Policies**

#### Mixed Use zone: Location and mix of activities

Policy 1: Locate the Mixed Use zone in a limited number of suitable locations within a close walk of the City Centre, Metropolitan and Town Centre zones and rapid and frequent services network.

Policy 2: Limit larger retail and office activities and provide for a range of commercial activities:

- a. that will not diminish the vitality and viability of the City Centre, Metropolitan and Town Centre zones
- b. that are compatible with the role and function of any nearby Local Centre zones.

Policy 3: Enable the development of intensive residential activities.

Policy 6: Development should not adversely affect the safe and efficient operation of the transport network.

City Centre Fringe Office Overlay policy: Provide opportunities for substantial office activities in the Mixed Use zone and the Local Centre zone in areas surrounding the city centre, recognising their proximity to the city centre and availability of excellent public transport services.

#### Amenity and Design

Policy 4: Require development to achieve a high standard of design.

Policy 5: Recognise the importance of particular streets identified on the Key Retail and General Commercial Frontage overlay as primary places for public interaction:

- a. by requiring buildings with frontages to these streets to:
  - (i). provide greater ground floor heights to maximise building adaptability to a range of uses
  - (ii). avoid blank walls
  - (iii). provide easily accessible pedestrian entrances.
- b. and in addition, require building frontages subject to the Key Retail Frontage overlay to:
  - (i). maximise glazing
  - (ii). erect frontages of sufficient height to frame the street
  - (iii). provide weather protection to pedestrians.

Policy 7: Promote and manage development to a standard of amenity that:

- a. recognises the moderate scale, intensity and diversity of business, social and cultural activities, as well as increases in residential densities provided in the zone; and
- b. avoids significant adverse effects on residents.

### **5.11.3 Rules and other methods**

The activity classification provides for residential activity as well as predominantly smaller scale commercial activity that does not cumulatively affect the viability of centres. There is a range of possible building heights, from three to six storeys. Rules do not specifically require a mix of uses on individual sites or within areas, but buildings should be adaptable so that the uses within them can change over time.

Some street frontages within the zone are subject to a Key Retail Frontage or General Commercial Frontage overlay. Development fronting those streets is expected to reinforce this function by being built up to the street frontage, having a substantial proportion of glazing to the street, and having the principal building entry at the street facade. Another overlay, the City Centre Fringe Office overlay, allows unlimited commercial office activity as

a permitted activity on land at the periphery of the city centre. Elsewhere, it is controlled at a lower proportion of the total GFA, to ensure it does not undermine centres.

New development within the zone requires resource consent in order to ensure that it is designed to a high standard which enhances the quality of streets within the area and public open spaces.

The proposed provisions are summarised in 5.9 above.

#### Mixed Use zone: Location and mix of activities

##### **Methods**

- (i). Rules and activity tables for activities within Mixed Use zone as these relate to the extent, type and scale of commercial and residential activities. Discretion as to trip generation, access and parking.
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education i.e. Mixed Use Guide, development contributions, codes of practice, LTP, Regional Plan provisions, council bylaws.

#### Amenity and Design

##### **Methods**

- (i). Rules and activity tables for activities within Key Retail and General Commercial frontage overlays
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education and design guides, development contributions, codes of practice, LTP, council bylaws

#### **5.11.4 Costs and Benefits of Proposed Policies and Rules**

Refer to Table 4 below for the environmental, social, economic and cultural costs and benefits of the policies/ rules.

#### **5.11.5 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed policies and methods.
- The evidence base and supporting information enables informed and transparent decision making.
- The risk of not acting is that the proposed policies and rules are required for sustainable management.

#### **5.12 Alternatives**

Alternatives are:

1. Preferred
2. Status quo
3. No provision for Mixed Use zones

The proposed preferred alternative is discussed in 5.9 above. The status quo alternative is outlined in 5.5 above.

#### **Alternative Three – No provision for Mixed Use zones**

This approach would seek to exclude the option of Mixed Use zones within the choice of zones implemented through the Unitary Plan.

The approach would accordingly provide a ‘hard edge’ to higher order centres as to the adjoining zoning options, rather than the ability to transition activities through the application

of the Mixed Use zone. Such an approach would have benefits in terms of the opportunities made available to alternative zonings, be this expanded centre zoning, General Business zoning or increased homogenous residential intensification, but would also bring with it costs in terms of an ability to appropriately provide for adverse effects to be avoided, remedied or mitigated.

Such an approach would also be less appropriate in terms of sustaining the physical resources that make up much of the built form in these areas, as a large number of these have transitioned into a mix of apartments, small scale business and service providers and community facilities, including within the operative Auckland City - Isthmus Business 4 zone. Not recognising and providing for these areas does not appropriately manage the use, development and protection of these physical resources.

The table below discusses each alternative compared to the proposed alternative.

Table 4

	<b>Preferred Alternative</b>	<b>Status Quo Alternative 2</b>	<b>Alternative 3 – Absence of Mixed Use zone)</b>
Appropriateness	<p><b>Description: Location and mix of activities in the Mixed Use zone</b> Having regard to their efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving objectives 1, 2 and 3.</p> <p><b>Description: Design requirements at Key Retail and General Commercial Frontage Overlay areas</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policy and the associated methods are the most appropriate to achieving Objective 4.</p>	<p>Currently, some sections of the operative Auckland Council District Plan include forms of Mixed Use zones, particularly around older town centres. They are also used to provide a buffer at the edges of newer town centres and between suburban residential development and nearby arterial roads or industrial land uses. As a potential resource for residential and business intensification, these current areas of mixed use are underutilised.</p>	<p>The approach would not find overall support in Part 2 of the Resource Management Act. There would be less ability to avoid, remedy and mitigate adverse effects at centre zone boundaries.</p> <p>Such an approach would also be less appropriate in terms of sustaining the physical resources that make up much of the built form in these areas, as a large number of these have transitioned into a mix of apartments, small scale business and service providers and community facilities. Not recognising and providing for these areas does not appropriately manage the use, development and protection of these physical resources.</p>
Effectiveness	<p><b>Description: Location and mix of activities in the Mixed Use zone</b> The policies and their methods (and rules) are effective. The policies acknowledge the benefits from the regional policies (3.1) that seek to ‘direct’ significant commercial recreational and social into the centres network. These policies, which relate to the establishment of Mixed Use zones on the fringe of higher order centres do so on the basis of the synergies that are anticipated from enabling a diverse range of residential options and intensification opportunities’, as well as commercial and community activities which in leveraging and benefiting from the transport, employment and social benefits from adjoining centres can provide compact and diverse mixed use environments within this zone.</p> <p><b>Description: Design requirements at Key Retail and General Commercial Frontage Overlay areas</b> The policies and their methods (and rules) are considered to be effective. The provisions identify the basis by which amenity and character can be maintained and enhanced through specific design and building resilience requirements. Such an approach provides certainty and long term investment in the physical resources represented within the Mixed Use zone, as well as those zones that adjoin these areas.</p> <p>Within the Key Frontage Overlay areas and the General Commercial Frontage Overlay areas there are applicable performance standards. These requirements reflect the specific outcomes sought within those areas which consists of the highest concentration of public / private interface as consistent with in-centre application of the overlays, and in turn requires a higher quality design response.</p> <p>The differentiated approach is considered highly effective in maintaining and enhancing the amenity of these different areas within the Mixed Use zone, but needs to be fully balanced with risks associated with delayed / reduced investment where design requirements are overly prescriptive or apply to too greater an area within the Mixed Use zone.</p>	<p>Status quo mixed use zones have largely followed the conversion and redevelopment of buildings, rather than led a consistent area redevelopment strategy.</p>	<p>The approach would not be effective in that does not provide an appropriate zoned response to recognising and providing for the existing environment already established in many of these areas, and applying amenity and design considerations accordingly.</p>
Efficiency	<p><b>Description: Location and mix of activities in the Mixed Use zone</b> The policies and their methods (and rules) can be implemented for a minor cost. The benefits of a proactive stance on economic and business development through primarily directing commercial recreational and social activity into commercial centres are significant and range from individual money saving, through to a more integrated approach for the development of infrastructure and broader integration with urban form.</p> <p>However, there is sufficient flexibility within the broad range of provisions within the Mixed Use zone so as to not exclude development opportunities where such development would better provide for social and economic well-being, as well as reduced motor vehicle dependence.</p> <p><b>Description: Design requirements at Key Retail and General Commercial Frontage Overlay areas</b></p>	<p>Currently, some sections of the operative Auckland Council District Plan include forms of Mixed Use zones, particularly around older town centres. They are also used to provide a buffer at the edges of newer town centres and between suburban residential development and nearby arterial roads or industrial land uses. They have been seen to be only partly efficient in these functions, and as a potential resource for residential and business intensification, these current areas of mixed use are underutilised.</p> <p>Status quo mixed use zones have largely followed</p>	<p>This option can be implemented at a substantial cost, principally to incumbent land owners and residents as certainty for existing uses may be reduced, and the ability to attract new investment and a diverse range of uses diminished.</p> <p>There are also consequential and cumulative impacts through not providing opportunities for intensive residential and commercial opportunities close to higher order centres which ultimately would be inconsistent with a desired goal of seeking a compact urban form to accommodate growth</p>

	<p>Maintaining and enhancing a quality urban environment was a key message within the Auckland Plan, and is broadly supported by the wider community.</p> <p>The approach to set tangible expectations in terms of nuisance, amenity and urban design parameters as associated with specific overlays, provides the most appropriate means by which to implement Objective 4. However there are moderate costs in achieving the benefits identified, especially where reinvestment is delayed or offset.</p>	<p>the conversion and redevelopment of buildings, rather than led a consistent area redevelopment strategy.</p>	
Costs	<p><b>Description: Location and mix of activities in the Mixed Use zone</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> (Limited) increase in nuisance issues as associated with increasing densities at interface with higher order centres.</p> <ul style="list-style-type: none"> <li>-In some instances decreased parking opportunities, particularly on-street.</li> <li>-Can increase traffic congestion.</li> </ul> <p><i>To the council:</i> No material social costs</p> <p><i>To business owners:</i> No material costs are anticipated from these policies.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> No material economic costs.</p> <p><i>to the council:</i> Increased administration costs.</p> <ul style="list-style-type: none"> <li>-Mitigation measures and increasing modal opportunities serving increased residential densities.</li> <li>-Inability to consider the 'network' effects of transport impacts from developments (Policy 5) can increase congestion and reduce the efficiency of the network and mitigation measures.</li> </ul> <p><i>To business owners:</i> Some limits in commercial and office opportunities.</p> <ul style="list-style-type: none"> <li>-Reduction in on-street parking opportunities serving small scale businesses.</li> <li>-Compliance with local environmental standards.</li> </ul> <p><b>Environment:</b> Some increase (limited) in reverse sensitivity effects between activities.</p> <ul style="list-style-type: none"> <li>-Can dilute economic activity outside of commercial centres (limited through restrictions on type / scale).</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Description: Design requirements at Key Retail and General Commercial Frontage Overlay areas</b></p> <p><b>Social:</b></p> <p>Limitation on the extent by which a wide range of activities may achieve design requirements can reduce diversity of activities and social enablement.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Costs of design / quality improvements will be passed onto consumers.</p> <p><i>to the council:</i> Administration costs associated with the extent of applications associated with 'broad' application of strict limitations when applied to a range of uses within the Mixed Use zone.</p> <p><i>To business owners:</i> Restrictions imposed through design conditions can limit opportunities for development of sites.</p> <ul style="list-style-type: none"> <li>-Application of requirements will require additional compliance costs.</li> <li>-Decrease in diversity through typologies not being able to comply with / provide for higher required quality of amenity, and design.</li> </ul> <p><b>Environment:</b> Blanket requirements can reduce opportunities for landmark or quirky development, or increasing the legibility of the streetscape.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p>	<p>Disruptive in communities when it involves a large change of building scale or intensity of use, such as a large format building supplies warehouse in a community of older detached houses.</p> <p>Overly impractical given the existence of mixed use physical resources already intensified around specific larger scale commercial centres.</p> <p>Lack of flexibility for land owners as to the diversity of uses for premises.</p> <p>Reduced choice in housing opportunities and ability to reside in close proximity to employment choices or transit nodes.</p> <p>Reduces ability for enhanced reinvestment and amenity and design improvements.</p> <p>Increased reverse sensitivity issues between incompatible activities at the zone interface.</p>	
Benefits	<p><b>Description: Location and mix of activities in the Mixed Use zone</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Supports small business growth and diversity of employment opportunities (including live / work units).</p> <ul style="list-style-type: none"> <li>-Can reduce trip generation and improve modal choice through increased diversity of activities and</li> </ul>	<p>Changes in land use will inevitably occur over time. The land surrounding the central city and the older town centres is in the best location for intensification, in terms of urban form and function and transport efficiency.</p>	<p>Reinforces the ability of higher order centres to be the principal focus of urban area intensification given the agglomeration benefits and transport modal choice that would eventuate.</p>

<p>proximity to centres.</p> <ul style="list-style-type: none"> <li>-Provides a greater diversity of housing opportunities.</li> <li>-Manages most reverse sensitivity issues through seeking to provide for compatible activities.</li> <li>-Small scale home occupations provided for.</li> <li>-Localised small scale community facilities are able to establish.</li> <li>-Addresses the scale of activities and limiting opportunities whereby these would result in adverse (significant) effects on centre vitality and viability.</li> </ul> <p><i>to the council:</i> Supports transit orientated developments through increased public transport usage.</p> <p><i>to business owners:</i> Opportunities for live-work units.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Creates efficiencies in terms of transport options, and accessibility to a range of activities.</p> <p><i>to the council:</i> Supports investment in public transport initiatives, and adjoining centre social facilities.</p> <p><i>to business owners:</i> Provides for a greater diversity and range of activities that can be undertaken.</p> <ul style="list-style-type: none"> <li>-Supports small business owners and operators.</li> </ul> <p><b>Environmental:</b> Reduces car dependency and provides a diverse range of employment and housing opportunities thereby providing choice and helping to achieve a compact urban form.</p> <ul style="list-style-type: none"> <li>-Addresses both strategic (centre vitality, transport network) and local (access) adverse effects.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Description: Design requirements at Key Retail and General Commercial Frontage Overlay areas</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Those living / employed along Key Retail and General Commercial Frontage overlay will have greater certainty as to amenity expectations.</p> <ul style="list-style-type: none"> <li>-Can reduce reverse sensitivity, interface clashes between business and residential users, particularly over operating hours, and residents' concerns over street appearance, noise, open space and visual privacy.</li> <li>-Provides low(er) maintenance living spaces through intensified residential opportunities close to green space.</li> <li>-Where successful enhances the quality of the local environment and vitality of the immediate area.</li> </ul> <p><i>to the council:</i> Likely decrease in nuisance disputes between incompatible activities.</p> <ul style="list-style-type: none"> <li>-Increased certainty in capital investment to reinforce 'sense of place'.</li> </ul> <p><i>to business owners:</i> Provides certainty in the amenity, design and nuisance expectations of adjoining developments.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Improved amenity reduces likelihood of centre decline, albeit may be offset by extent to which design requirements delay / reduce investment.</p> <p><i>to the council:</i> Ability to plan for and provide benefits in terms of amenity projects.</p> <p><i>to business owners:</i> Improved amenity and functioning of a zone is likely to have flow on effects to commercial opportunities.</p> <ul style="list-style-type: none"> <li>-Increased certainty in terms of the physical resources associated with business activity within commercial centres, given the design and quality focus associated with redevelopment and consolidation of activities within the zone.</li> </ul> <p><b>Environmental:</b> Overall managed risk to people and communities health and safety and well-being through managing nuisance effects, and providing standards for maintaining character and amenity.</p> <ul style="list-style-type: none"> <li>-Benefits to urban form and growth through providing higher amenity opportunities' for mixed use within close proximity to the centres network.</li> <li>-Improvement in public realm quality and a reduction in poor design, visual clutter, or incompatible nuisance effects (wind, privacy intrusion, and other offensive or noxious qualities) can improve the aesthetic values and amenity of physical resources in the zone.</li> </ul> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>		
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Risks	<p><b>Description: Location and mix of activities in the Mixed Use zone</b>  The key risk to the approach is the extent to which the Mixed Use business zone is applied, and ensuring that such areas provide real opportunities to develop as per the outcomes sought.</p> <p><b>Description: Design requirements at Key Retail and General Commercial Frontage Overlay areas</b>  The key risk is that the extent of design requirements reduces reinvestment and development options (especially where substantial opportunities for redevelopment are limited through the Activity tables / cadastral prospects). This risk is reduced through the application of the Mixed Use zone to those areas where there is substantial pressure for residential intensification and small scale business development.</p>	The key risk is the extent by which potential capacity to accommodate intensive residential and small scale commercial enterprises is under-provided, increasing the extent of the capacity shortfall for commercial and residential uses to be contained without expanding the urban boundary	The key risk is the extent by which potential capacity to accommodate intensive residential and small scale commercial enterprises is diminished, thereby increasing the extent of the capacity shortfall for commercial and residential uses to be contained without expanding the urban boundary
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### **5.13 Conclusion**

Providing for a number of Mixed Use zones within close proximity to high order centres provides for a number of 'better' environmental outcomes including: increased certainty and sustaining the use of physical resources, increased functional amenity, and reinvestment, with the use of urban design as a mechanism for improvement. Other benefits include that:

- a. such areas are integrated with and supported by rapid, frequent and integrated transit services, specifically in terms of access to an adjoining high order centre;
- b. they provide (or have the potential for) a critical mass of resident population within walking distance of passenger transit nodes and of a density to support public transport;
- c. as the range of activities is managed, they do not compromise the development of a network of commercial centres as the primary focus for the region's commercial growth;
- d. they maintain or enhance character and amenity values;
- e. they provide for a suitable mix of open space, business and commercial opportunities corresponding to the community served by urban intensification; and
- f. maintain the function of the supporting road network.

## **6 Overview of Section 3.8 General Business zone in zone objectives and policies**

### **6.1 Subject Matter of this Section**

The Unitary Plan (within Section 3.1) proposes to consider a number of potential adverse effects on the social, economic and cultural well-being of people and communities of Auckland from the distribution of retail activity across the region, but recognises that this needs to be reconciled against the identified capacity constraints associated with the existing centre network. At a general level effects to be considered include:

- ‘Distributional effects’, or the dilution of retail to the point that the function and amenity of existing centres erodes, causing adverse impacts on the economic and social well-being of people and communities;
- Loss of industrial land resource; and
- Adverse effects on the sustainability of the transportation network and public transport efficiency.

While the GB zone does not spatially or explicitly provide for large format retail, the zone description identifies that the outcome seeks to enable larger format retail activity, trade supplier retail and a range of lighter industrial activities to establish within defined locations, provided that certain criteria are achieved.

The zone purpose is essentially to provide for a concentration of a range of larger or trade based retail operations around centres or along corridors. The general nature of the rules therefore needs to range from district centre type rules (in terms of amenity expectations and design) through to industrial rules (in terms of scale of activity, impacts on the transport network). The most appropriate rule settings will balance the tension between the existing receiving environment, the enablement of commercial land use, and minimising any strategic effects on urban form and the viability of the centres network.

### **6.2 Resource Management Issue to be Addressed**

Section 3.1 ‘Enabling Economic Well-being’ addresses two resource management issues, they are:

- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well-being;

Enabling Quality Urban Growth (Issue 1.1), with respect to the GB zone, seeks to provide direct guidance in objectives and policies in terms of ensuring a mix of compatible business activities (Objective 3). Economic enablement is enhanced across the region (Issue 1.22) through providing additional capacity for those business activities that are unsuited to a centres environment (Objective 1).

Eight specific policies are set out for these objectives, together with implementation methods for each policy. These eight policies can be grouped as follows:

- 1) Policies that seek to ensure an appropriate distribution of the zone, its integrity with achieving a compact urban form, and zone function (policies 1, 2, 3 and 4).
- 2) Policies that seek to manage intra-zone nuisance, amenity and design (policies 5, 6 and 7)
- 3) Policies seeking to ensure consideration of the transport environment (Policy 8).

### **6.3 Significance of this Subject**

This zone provides for business activities that may not be appropriate for, or are unable to locate in, centres. This includes activities ranging from light industrial to limited office, large format retail and trade suppliers. Large format retail (more than 450m<sup>2</sup> GFA) is preferably located in centres but it is recognised that this is not always possible. These activities are appropriate in the General Business zone only when this does not adversely affect the

vitality and viability of the city centre, metropolitan and town centre zones. Although the application of the zone within Auckland is limited, it is an important part of the Unitary Plan's strategy to provide for growth in commercial activity and manage the effects of large format retail. Approximately 47 percent of the 1.4 million square metres of large format retail floor space in Auckland is located outside the centres (Fairgray 2013).

#### **6.4 Auckland Plan**

Auckland Plan does not provide explicit guidance on the approach to business activities unable to locate within centres. It does propose the primacy of centres for business activity, but recognises that this is not always possible (Directive 10.8, p 255 – “Auckland’s network of centres will...be the primary focus for retail and other commercial activity, providing a wide range of outlets in a competitive environment, while limiting out-of-centre retail and office development.”) The proposed Unitary Plan also includes secondary alternatives of identified growth corridors and the General Business zone.

#### **6.5 Current Objectives, Policies, Rules and Methods**

The operative Auckland Council District Plan has a range of objectives, policies, rules and methods across the different plan sections (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Centre and Auckland City Isthmus) some of which seek to manage out-of-centre large format retailing, and some allowing substantial proportions of office and retail activity to occur in locations away from frequent public transport routes. All legacy councils had changed the district plans to begin to give effect to the RPS directions on growth, particularly in centres, and some had begun to attempt to manage effects of out-of-centre retail. Although some large format retail has been developed within and on the edge of existing and new centres, some of the legacy district plans zoned land specifically for that purpose, and/or allowed it to occur within the light industrial zones.

#### **6.6 Information and Analysis**

The General Business zone was developed following Change 6 to the Auckland Council RPS and earlier planning work, in recognition of the need to provide a supply of land for mainly large format retail that could not find suitable locations within centres. The General Business zone only has limited application at present and largely reflects the locations of existing clusters of large format retail activity. The zone was designed to be able to accommodate a broader range of uses than just large format retail. It has the transport accessibility and amenity standards to provide for some office and light industrial activities. The zone intent and deployment also relates to the approach to identified growth corridors, which have in some stretches the character of General Business zones.

<b>Document</b>	<b>Purpose/Description</b>	<b>Date</b>	<b>Appendix</b>
Case law - centres and commercial activity		-	3.4.1
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Draft Auckland Plan – Technical Report: Centres</i>	Analysis of centres strategy, hierarchy and criteria	2011	3.4.5

<i>and Corridors</i> Auckland Council			
<i>Auckland Retail Economic Evidence Base</i> Fairgray, S RIMU Auckland Council	Existing retail distribution, and region-wide retail supply-demand balance	2013	3.4.9

## 6.7 Consultation Undertaken

See Appendix 3.39.2.

## 6.8 Decision-Making

See Appendix 3.39.3.

## 6.9 Proposed Provisions

The General Business zone provides for business activities ranging from light industrial to limited office, large format retail and trade suppliers, where locations are required outside of centres. Large format retail (greater than 450m<sup>2</sup> GFA per site) is a restricted discretionary activity in the GB zone. Application of the zone is limited, but an important part of the strategy to provide for growth in commercial activity and manage the effects of large format retail.

Small retail activities are not appropriate in the zone as the presence of these activities, in combination with large format retail, will effectively create an unplanned centre. Residential activity is also not envisaged due to the presence of light industrial activities and the need to preserve land for out-of-centre commercial opportunities.

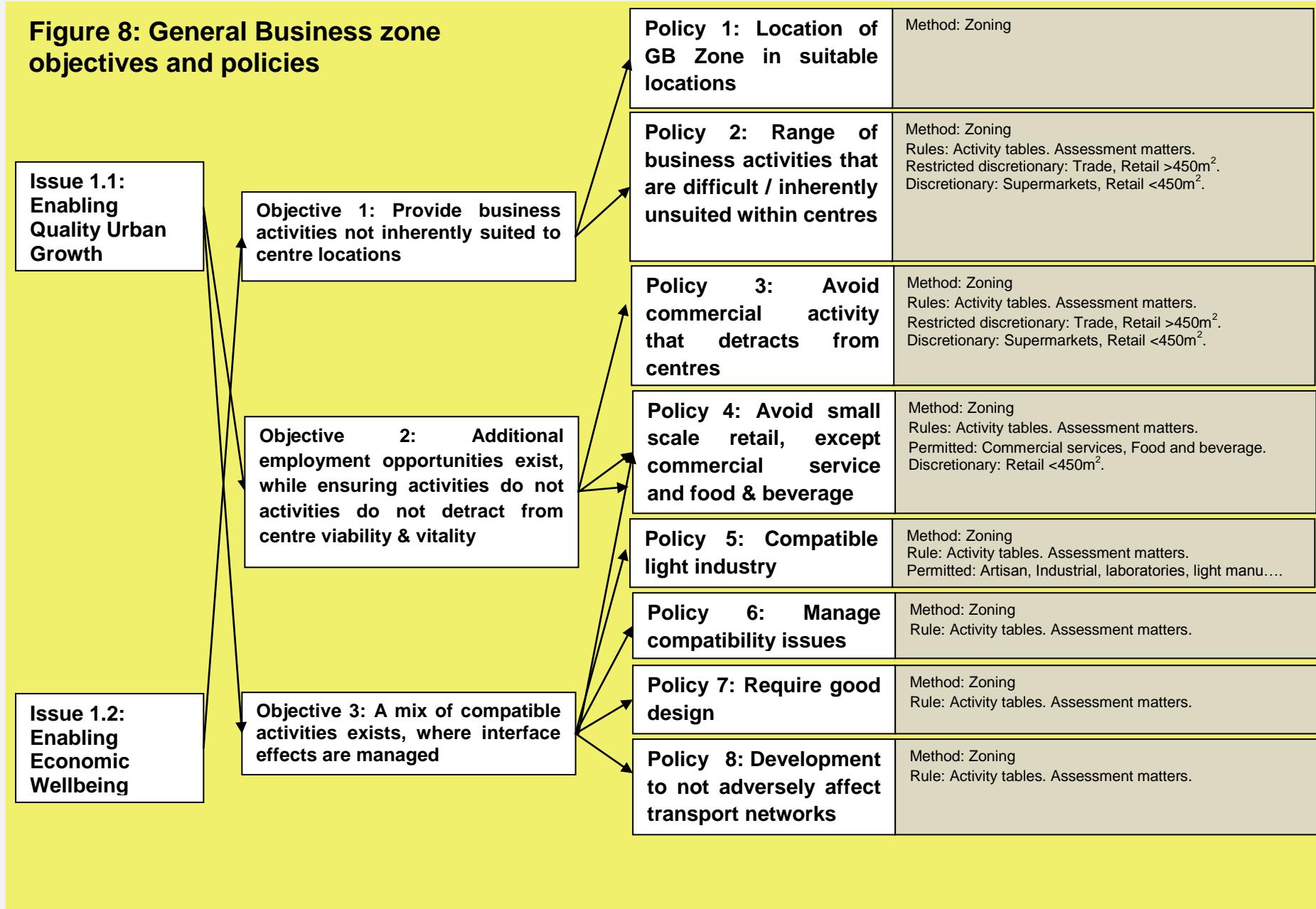
The zone is located in areas close to the city centre, metropolitan and town centre zones or along identified growth corridors, where there is good transport access and exposure to customers. The design of development within this zone is expected to contribute to an active street edge.

## 6.10 Reference to other Evaluations

Refer Section 2.10 above.

The following Figure 8 demonstrates the linkages between the issues and the district objectives and policies.

**Figure 8: General Business zone objectives and policies**



## 6.11 Objectives, Policies and Rules

### 6.11.1 Objectives

The following objectives in 3.8 zone objectives and policies are proposed:-

#### Objectives

*1. Business Activities are provided for that may not be appropriate for, or are not able to locate in centres.*

*2. Additional employment opportunities exist in a limited number of areas which are located along identified growth corridors or close to City Centre, Metropolitan and Town Centre zones, while ensuring activities within the zone do not detract from the vitality and viability of these centres.*

#### Appropriateness

The objectives and the associated zone seek to provide for larger scale commercial activity that has established primarily within historically lighter industrial zones within Auckland. The zone is generally to: act as a buffer between residential zones and busy arterial networks; provide for a range of less sensitive community and industrial activities; and in many instances provide capacity for large format retail activities unable or inappropriately located within centre, as subject to controls to consider network transport effects, and compatibility with the role and function of nearby centres.

The key defining character between the GB zone and the commercial centre network is the restriction of small 'speciality stores' which are best described as retailers who occupy premises up to 400m<sup>2</sup> (but usually smaller) – noting a 450m<sup>2</sup> GFA trigger is applied in the provisions. They are specialists in their field, e.g. fashion apparel, footwear and cosmetics. An agglomeration of these sorts of activities, in combination with larger format retail (anchor stores such as Department stores and supermarkets) would not only begin to replicate the function of an existing centre, but could therefore give rise to distributional effects on existing centres. The framework supporting the GB zone would therefore provide for a way to enable large format retail that may otherwise be incompatible (such as trade suppliers) or unable (through capacity constraints within an existing centre), and restrict those retailing activities that are undertaken in centres which have a predominance of speciality retail shops, and therefore promote compatibility between these two major types of retail offer.

It would be undesirable, in terms of reverse sensitivity and the potential loss of the scarce industrial land resource for necessary industrial employment and productive activities, to apply a GB zone objective, policy and zone framework in an area where there is not a significant existing level of retail infrastructure either established or consented to. Such an approach:

- Assists in enabling a range of retail activities that provide for people and communities to be able to further their social and economic well-being in a way, or at a rate which may otherwise be difficult, unable or have unintended consequences to establish in commercial centres.
- Provides for the use, development and protection of physical resources associated with the larger format retail typologies that may already exist in the zoned GB areas, but also provides for the continuation of lighter industrial and productive employment enterprises within the zones.
- Lastly, the objectives seek to ensure that activities remain compatible, and that in-zone enablement is not at the expense of centre viability and vitality (and hence a compact urban form). Accordingly the provisions provide the requirement to recognise and manage any adverse effects of activities on the environment at both a strategic and local level, as well as manage issues associated with health and safety (as provided through Objective 3).

The objectives are also considered in accordance with the following principles of the Act:

S7(b) in that the objectives to promote certainty in ongoing economic

development within the GB zone which will provide for the continued use of physical resources represented by existing larger format retail activity.

S7(g) in that the objectives seek to provide for the efficient use of buildings, land and within the GB zone.

S7(c) and s7(f) as the objectives seek to ensure that activities within the GB zone do not occur at the expense of commercial centre vitality and amenity.

It is noted that the zone is probably less efficient in comparison to providing all general merchandise and supermarket retail within centres, regardless of scale. Accordingly in terms of S7(ba) there may be a slight increase in trip generation, although this is diminished somewhat by the extent of pass-by trips and cross-shopping opportunities provided by retail outlets. There is a spectrum of cross-shopping opportunities not provided by the exclusion of department stores and supermarkets, being the greatest lost opportunity as compared to centres.

The objective is useful in that providing for a range of compatible larger format retail typologies and light industrial uses within close proximity to a number of centres can:

- be effective in clarifying the purpose of any physical larger format retail infrastructure within the zone, and that such activities have some history in operating in the area;
- be effective in clarifying in the plan the types of activities intended to be undertaken within the GB zone;
- provide considerable additional capacity to meet anticipated retail market demand (through household expenditure and household growth), in a manner that remains compatible with the role and function of the City's centre network.
- provide for the continuation and development of a wide range of lighter industrial employment opportunities.

The policy is achievable with the Unitary Plan providing for larger format retail development opportunities, by zoning, adjoining a number of centres or along corridors to overcome development and suitability constraints of locating such activities only within centres.

### **Objectives**

**Objective 3**  
*A mix of compatible business activities exist, where the adverse effects on amenity values and the environmental qualities at the interface with other zones are managed.*

### **Appropriateness**

The objective seeks to ensure that despite having a range of retail, service and industrial employment activities operating within the zone, the scale, effects and character of such activities remain such that reverse sensitivity effects can be avoided.

The environmental quality and amenity of the likely buildings, activities and nuisance can be managed in terms of design and acceptable environmental limits for issues such as noise, odour and glare. Also, while the zone will not be expected to be of the same high quality design and quality as the MU zone and centres zones, a good level of amenity is expected given the transition in the zone between those activities that may have many public customers, such as trade suppliers or larger format retail, and those more 'working environments' such as light industrial warehousing and manufacturing activities.

Accordingly, the objective seeks to maintain the social, cultural and economic well-being of people and communities, primarily through ensuring a compatible level of quality built form, acknowledging that

these areas are predicated by a mixture of industrial and retail activities. The health and safety of people and communities is also expected to be provided for, through reasonably high standards to be met in terms of environmental nuisance, as would be expected given the extent of public activities that could be anticipated within the zone.

The objective is also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in the continued use of physical resources represented by existing employment and larger format retail activities within the zone.

S7(c) and s7(f) as the objective specifically identifies a reasonable benchmark for a good level of amenity values and design within the zone reflecting the anticipated range of activities.

The objective is useful and reasonable in that it recognises that the amenity and character of the zone must be a consequence of the range of activities provided for. Accordingly, there must be public acceptance that the level of amenity should not be as high as that expected within the centres network or within the MU zone.

The objective is achievable in seeking to create a consistent (and homogenous) amenity and character for what is likely to be a varied range and character of activities within the zone.

### **6.11.2 Policies**

#### General Business zone: Location and range of commercial activities

1. Locate the zone adjacent or close to the City Centre, Metropolitan and Town Centre zones and along identified growth corridors.
2. Enable a range of business activities, including light industry, large format retail, trade suppliers and small service activities, that are either:
  - (a). difficult to accommodate within centres due to their scale and functional requirements
  - (b). more appropriately located outside of the City Centre, Metropolitan Centre or Town Centre zone.
3. Avoid commercial activity of a scale and type locating within the zone that will detract from the vitality and viability of the City Centre, Metropolitan and Town Centre zones.
4. Avoid small-scale retail activities locating within the zone except for commercial services and food and beverage activities.

#### Activity Compatibility

5. Enable light industrial activities to locate within the zone but discourage activities which have objectionable odour, dust or noise emissions.
6. Manage compatibility issues of activities within and between developments through site layout and design measures.
7. Require a good standard of design given the location of the zone close to centres and along growth corridors.
8. Manage development so that it does not adversely affect the safe and efficient operation of the transport network.

### **6.11.3 Rules and other methods**

The proposed provisions are described in 6.9 above, principally applying a zone where large format retail (greater than 450m<sup>2</sup> GFA per site) is a Restricted Discretionary activity. Matters of discretion include intensity and scale, traffic, design of car parking, access and servicing.

#### General Business zone: Location and range of commercial activities

##### **Methods**

- (i). Rules and activity tables for activities within General Business zone as these relate to the extent, type and scale of commercial activities.
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education development contributions, codes of practice, LTP, council bylaws.

#### Activity Compatibility

##### **Methods**

- (i). Rules and activity tables for activities. Rules for nuisance (lighting, noise, signs).
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education and design guides, development contributions, codes of practice, LTP, council bylaws.

### **6.11.4 Costs and Benefits of proposed Policies and Rules**

Refer to Table 5 below for the environmental, social, economic and cultural costs and benefits of the policies/ rules.

### **6.11.5 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed policies and methods.
- The evidence base and supporting information enables informed and transparent decision making.
- The risk of not acting is that the proposed policies and rules are required for sustainable management.

## **6.12 Alternatives**

Alternatives are:

1. Preferred
2. Status quo
3. Liberal approach to the mix of activities within the General Business zone

The proposed preferred alternative is discussed in 6.9 above. The status quo alternative is outlined in 6.5 above.

#### **Alternative Three – Liberal approach to the mix of activities within the General Business zone**

This option would comprise an objective which enables a range of commercial activities within the General Business zone, including both small scale and larger format retail opportunities (in combination with the lighter industrial options enabled).

The option is not focused on social well-being as there is an underlying assumption that the market will determine which activities will succeed and which will fail, and that people will support developments that contribute to their well-being.

The table below discusses each alternative compared to the preferred alternative.

Table 5

	<b>Preferred Alternative</b>	<b>Status Quo Alternative 2</b>	<b>Alternative 3 <i>Liberal approach to commercial activities in the General Business zone</i></b>
Appropriateness	<p><b>Description: Location and range of commercial activities – General Business zone</b>  Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving objectives 1 and 2.</p> <p><b>Description: Activity Compatibility</b>  Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policy and the associated methods are the most appropriate to achieving Objective 3.</p>	<p>The operative Auckland Council District Plan has a range of objectives, policies, rules and methods across the different plan sections (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Centre and Auckland City Isthmus) some of which seek to manage out-of-centre large format retailing, and some allowing substantial proportions of office and retail activity to occur in locations away from frequent public transport routes. All legacy councils had changed the district plans to begin to give effect to the RPS directions on growth, particularly in centres, and some had begun to attempt to manage effects of out-of-centre retail.</p>	<p>The approach would not find overall support in Part 2 of the Resource Management Act.</p> <p>Not recognising and providing for the existing centre network, through appropriately constraining the range of activities undertaken in the General Business zone, does not appropriately manage the use, development and protection of existing centres as physical resources.</p>
Effectiveness	<p><b>Description: Location and range of commercial activities – General Business zone</b>  The policies and their methods (and rules) are effective. The approach would seek to provide a necessary ‘release valve’ to provide opportunities to accommodate substantial growth in larger format retail activities anticipated as necessary (and demanded) by the wider Auckland public, where these activities would either be difficult or inherently unsuited (such as a trade supplier removing opportunities for finer grain and higher design quality retail) to commercial centres.</p> <p>Smaller scale retail and most office activity is primarily provided for in the centres network. The efficient and sustainable operation of the centres network is maintained and enhanced on the basis of a critical mass of retail and office activity in-centre. If these activities are allowed to locate elsewhere (especially in agglomeration with larger format retail generally ‘provided’ for in the GB zone, it can lead to the decline of commercial centres with all the adverse disablement economic and social effects that creates for the community. Accordingly, the provisions limiting smaller scale retail and all office activities are seen as effective and appropriate for meeting objectives 1 and 2.</p> <p>Lighter industrial activities are provided for recognising the employment benefits such productive enterprises provide. Commercial service and food and beverage outlets are permitted given that these provide a valued convenience resource to workers and passers-by in the area and are unlikely (on their own) to generate distributional effects.</p> <p><b>Description: Activity Compatibility</b>  The policies and their methods (and rules) is considered to be effective. The provisions are differentiated from higher amenity expectations within centres in terms of the outcomes sought, in recognition that these areas remain ‘working environments’. The provisions identify the basis by which amenity and character can be maintained and enhanced through specific design and building requirements. Such an approach provides certainty and compatibility between activities anticipated in the zone.</p>	<p>Status quo continuation of existing district plan approaches would not be effective in that it does not adequately recognise and provide for a consolidation strategy associated with higher density development around the centres. The approach would also allow the continuing centres dilution and dispersal of commercial activity, and continuing reductions in opportunities for light industrial development.</p>	<p>The approach would not be effective in that it does not recognise and provide for the existing physical resources represented by the centre network and the consolidation strategy associated with higher density development around these. The approach would also provide for the dilution of commercial activity, and reduce opportunities for light industrial development.</p>
Efficiency	<p><b>Description: Location and range of commercial activities – General Business zone</b>  The policies and their methods (and rules) can be implemented for a moderate cost. These are largely associated with lost opportunities for being able to accommodate the full range of retail outlets within the commercial centre network (excluding trade suppliers). In real terms therefore, given the constraints on in-centre development, such costs are outweighed by the benefits of providing for these activities within the GB zone, where, as subject to appropriate controls such activities can remain compatible with the centres network, and attainment of a compact urban form.</p> <p>The benefits of the provisions as these relate to simple thresholds for retail activity (e.g. retail greater than 450m<sup>2</sup> as restricted discretionary activities) are that the provisions are simple to apply. The costs are that the provisions are somewhat disenabling (in that consent would general always need to be sought, albeit with policy support) and they also may be viewed by applicants as counter to the purpose of the General Business zone which purports to promote a range of commercial and</p>	<p>Without additional specifically zoned opportunities for location of large format retail, the Environment Court would continue to allow incursions into light industrial zones. There are efficiency gains for the owners/operators of these businesses, but at the cost of efficiency of industrial land supply and transport networks</p>	<p>This option can be implemented at a substantial strategic cost, principally to those who rely on the existing network of centres to provide for their social and economic well-being.</p> <p>There are also consequential and cumulative impacts which ultimately would be inconsistent with a desired goal of seeking a compact urban form to accommodate growth.</p>

	<p>larger format retail activities.</p> <p><b>Description: Activity Compatibility</b></p> <p>Maintaining and enhancing a quality urban environment was a key message within the Auckland Plan, and is broadly supported by the wider community.</p> <p>The approach to set tangible expectations in terms of nuisance, amenity and design represents an efficient means to implement objective 3. However there are moderate costs in achieving the benefits identified, especially where reinvestment is delayed or offset.</p>		
Costs	<p><b>Description: Location and range of commercial activities – General Business zone</b></p> <p><b>Social</b></p> <p><i>to the community:</i> (Limited) social interaction opportunity costs where larger format retail activities do not establish within centres (diminished where activities are to remain compatible with in-centre activity)</p> <p>-Can increase traffic congestion around larger format retail 'nodes' where these exist in the zone. Shopping types typically require use of private vehicles.</p> <p><i>to the council:</i> No material social costs</p> <p><i>To business owners:</i> No material costs are anticipated from these policies.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> No material economic costs.</p> <p><i>to the council:</i> Increased administration costs as associated with restricted discretionary ('RD') activities for a range of established outlets, where rebranding / expansion would result in a requirement for consent to be obtained.</p> <p>-Need for diversion of transport network capital expenditure from in-centre mitigation to address GB zone network / access issues where larger format retail 'nodes' establish. (Limited) Opportunity cost for public transport efficiencies (recognising many trips to LFR are by private vehicle).</p> <p><i>To business owners:</i> Some limits in commercial and office opportunities.</p> <p>-Compliance with local environmental standards.</p> <p>-Increased consenting costs as associated with RD activities for a range of established outlets, where rebranding / expansion would result in consenting.</p> <p>-Rising land costs could foreclose industrial opportunities within the zone.</p> <p><b>Environment:</b> Can dilute economic activity outside of commercial centres (limited through restrictions on type / scale to ensure absence of significant distributional effects)</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Description: Activity Compatibility</b></p> <p><b>Social:</b></p> <p>Limitation on the extent by which a wide range of activities may achieve design requirements can reduce diversity of activities and social enablement.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Costs of design / quality improvements for any complying retail outlets will be passed onto consumers.</p> <p>-Reduction in some industrial activities unable to comply with nuisance requirements (relocated to industrial zones) which may reduce diversity of employment in immediate area.</p> <p><i>to the council:</i> Administration costs associated with the extent of applications associated with 'broad' application of narrow limitations when applied to a range of uses within the General Business zone.</p> <p><i>To business owners:</i> Restrictions imposed through design conditions can limit opportunities for development of sites.</p> <p>-Application of requirements will require additional compliance costs.</p> <p>-Decrease in diversity through typologies not being able to comply with / provide for 'good standard' of required amenity, and design.</p> <p><b>Environment:</b> Blanket requirements can reduce opportunities for land redevelopment and reinvestment.</p>	<p>There are costs of effects on the transport networks and the social and economic costs to centres viability. Large format retail can be currently relatively unpredictable in its selection of locations, except for seeking highly visible sites and road access. They currently have access to extensive areas of industrial land where site and establishment costs are less and built environment amenity requirements are also lower,</p> <p>Increased congestion in key roads. Potentially continuing high costs associated with transport infrastructure (to both the council and business owners) in terms of both maintaining road safety and capacity where new retail 'nodes' establish, as well as potential re-routing public transport infrastructure.</p> <p>Cost of having inconsistent policy and rules across the different sections of the Auckland Council District Plan, including a 'lowest common denominator' ability to defend legal challenges to the policy approach.</p>	<p>Some compliance costs, in terms of ensuring that amenity and reverse sensitivity issues are addressed. An anticipated increase in the extent of incompatible activities in the zone.</p> <p>Potentially high(er) costs associated with transport infrastructure (to both the council and business owners) in terms of both maintaining road safety and capacity where new retail 'nodes' establish, as well as potential re-routing public transport infrastructure.</p> <p>Effects on existing centres, thus disenabling people and communities who rely on those centres</p> <p>Increased congestion in key roads.</p> <p>A lack of control over both the size and nature of retail activities may result in the establishment of a new town centre by stealth, with a risk that these may generate significant distributional effects on existing centres.</p> <p>However the approach does not recognise the variety of communities which together comprise Auckland. While one sector may be advantaged by an increase in types and locations of goods delivery, other sections of the community may be disadvantaged through an inability to access these locations and the potential adverse effects upon existing commercial centres that are relied upon for meeting their needs. It is recognised that this option may provide for the enablement of economic well-being for individual developers within the zone, which will be provided with more development options, and members of the community with ready access to private vehicles may also benefit.</p> <p>However, it is considered that there is a net loss in economic well-being, where such a range of commercial activity within the General Business zone would diminish existing centre viability and vitality, by not avoiding strategic adverse effects.</p> <p>Not recognising and providing for the existing centre network, through appropriately constraining the range of activities undertaken in the General Business zone, does not appropriately manage the use, development and protection of existing centres physical resources.</p>

	<b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.		
Benefits	<p><b>Description: Location and range of commercial activities – General Business zone</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Existing centres not adversely affected by GB zone activity, thus continuing to enable people and communities who rely on existing centres for their social and economic well-being.</p> <p>-Assists in overcoming in-centre capacity issues, and enables a choice of both larger format retail and existing centres, thus enhancing social and economic well-being.</p> <p><i>to the council:</i> Can provide for re-investment on identified growth corridors and amenity improvements.</p> <p><i>to business owners:</i> No material social benefits.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Those living in close proximity to GB larger format retail (or can undertake efficient pass-by trips) may be better serviced for goods and services.</p> <p><i>to the council:</i> Integration of infrastructure and land use.</p> <p><i>to business owners:</i> Enabling for larger format activities and for businesses that would not generate distributional effects.</p> <p>-Benefit to businesses whose trade is assisted by higher amenity surroundings.</p> <p><b>Environmental:</b> Limited scope for adverse effects on the function and amenity of existing centres.</p> <p>-Can improve amenity through assisting in re-investment.</p> <p>-Addresses both strategic (centre vitality, transport network) and local (access) adverse effects.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Description: Activity Compatibility</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Can reduce reverse sensitivity, interface clashes between business and any adjoining residential activities, particularly over street appearance, noise, and glare.</p> <p>-Where successful enhances the quality of the local environment and vitality of the immediate area.</p> <p><i>to the council:</i> Likely decrease in nuisance disputes between incompatible activities.</p> <p><i>to business owners:</i> Provides certainty in the amenity, design and nuisance expectations of adjoining developments, reduction in incompatible activities.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Improved amenity where reinvestment occurs.</p> <p><i>to the council:</i> No material economic benefits.</p> <p><i>to business owners:</i> Improved amenity and functioning of a zone is likely to have flow on effects to commercial opportunities.</p> <p>-Increased certainty in terms of the physical resources associated with business activity within the zone.</p> <p><b>Environmental:</b> Overall managed risk to people and communities health and safety and well-being through managing nuisance effects, and providing standards for maintaining character and amenity.</p> <p>-A higher standard of visual amenity and character.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>	<p>Status quo benefit lies in the known distribution of large format retail, and the high visibility and transport access that those businesses seek. If allowed to continue, the main streets of Auckland outside of the centres will become dominated by large, utilitarian buildings with large format retail activities. Varying levels of control across the different sections of the Auckland Council District Plan will result in some differences in the deployment and design and rate at which large format retail establishes, providing opportunities for best practice plan consistency at a later date.</p>	<p>Flexibility in that there is little limitation on the nature and scale of retail activities anticipated in the zone.</p> <p>Fewer consenting and administration costs.</p> <p>Those living in close proximity (or undertake efficient pass-by trips) may be better served for some goods and services</p>
Risks	<p><b>Description: Location and range of commercial activities – General Business zone</b></p> <p>The key risk to the approach is the extent to which the General Business zone is applied, as too little provision will not adequately provide opportunities to those activities that cannot locate in or may have poor outcomes for centres, whereas too much would reduce / dilute the benefits attributed by the centres approach to agglomerating commercial activity primarily in centres.</p> <p><b>Description: Activity Compatibility</b></p> <p>The key risk is that the extent of design requirements reduces reinvestment and development options.</p>	<p>The key risk with the status quo approach is that, notwithstanding the operative status of Change 6 to the RPS, the district plan sections across Auckland are inconsistent in the way they approach out-of-centre large format retailing, including supermarkets.</p>	<p>The key risk is the extent by which such provisions would result in the inefficient provision of commercial activity in Auckland, and how this could then be integrated with wider strategic policies relating to residential intensification and public transport initiatives.</p>

### **6.13 Conclusion**

The proposed zoning seeks to ensure that there are opportunities for general business development including larger format retail activities, but at a scale and subject to criteria that would ensure that adverse effects on centre vitality, transport integration and urban structure can be considered. Such an approach is a rational mechanism to ensure that the strategic aims of the Auckland Unitary Plan can be met, and that the application of the General Business zone does not extend to large areas that would prevent the role and function of centres.

## **7 Overview of Section 3.9 Business Park zone in zone objectives and policies**

### **7.1 Subject Matter of this Section**

Commercial office development represents a large physical investment in infrastructure within commercial centres and the city centre. Those working in such developments can also create stress on the surrounding transport network, and also demand for additional commercial and community facilities to meet their needs. The location of most office developments therefore benefits from being integrated with the transport network, particularly public transport, and commercial and social nodes within Auckland. The centralisation of office activity within a given area creates economies of scale and synergies that lead to greater efficiencies than if that activity were spread over an entire region.

Commercial activities, which includes personal services, communication services, finance, insurance, real state, business services, and government administration, provide a large driver of Auckland's total employment growth. The ability to accommodate a substantial proportion of commercial activity development within the centres network provides substantial opportunities for re-investment within centres and particularly in the central City, as well as increased agglomeration benefits.

However, it is also acknowledged that historically some office developments have been established outside of commercial cores, and in some instances now represent substantial physical resources. The two largest of these 'office parks' are located at Smales Farm in Takapuna and Central Park in Penrose.

The key issue for office distribution within Auckland is the continued decentralisation of office activity away from the city centre and the commercial centres network. Such decentralisation is expected to have considerable impacts on the economic activity within the CBD that is not compensated for in its regional relocation, as well as creating significant inefficiencies in terms of supporting such developments by the public transport network.

It is recognised that there are other locations where there are also clusters of office developments, however the absence of a substantial scale of office activity, and / or where such areas is not solely characterised by office developments, has resulted in the limited application of the zone and provisions. Also it would be undesirable, in terms of the potential loss of industrial land and loss of agglomeration benefits, to apply the Business Park zone objectives, policies and zone framework in any area where there is not a significant existing level of office development established, and where such provides a homogenous character for the receiving environment.

The Business Park zone ('BP zone') seeks to recognise and provide for ongoing office developments at Smales Farm and Central Park. The associated policies also provide criteria for the considered application of the zone to new areas such that impacts on the transport network, opportunity costs on centres, and links to public transport can be examined (Objective 1). The provisions also seek to ensure that the establishment of retail activities is limited, primarily to avoid the establishment of new centres there (Objective 2), albeit that convenience-based retail and service activities are provided to support employees within the zones. Lastly, a high level of amenity is expected (Objective 3), given the expected character and design requirements that the users of such office parks would expect.

The objectives and policies of this section of the Unitary Plan provide the framework for the management and distribution of activity within the Business Park zone.

## **7.2 Resource Management Issue to be Addressed**

Section 3.1 'Enabling Economic Well-being' addresses two resource management issues, they are:

- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well-being;

Enabling Quality Urban Growth (Issue 1.2), with respect to Section 3.9 (BP zone), seeks to provide direct guidance in objectives and policies in terms of ensuring a high amenity and quality, as well as connection to the wider transport network (Objective 3). Retail activities are restricted on the basis of ensuring that the prospect of significant distributional effects on the surrounding centres network and a loss of amenity in such centres is reduced (Objective 2).

Economic enablement is enhanced across the region (Issue 1.2) through providing recognition for substantial office complexes (Objective 1).

Six specific policies are set out for these objectives, together with implementation methods for each policy, are set out. These six policies can be grouped as follows:

- 1) Policies that seek to ensure that any new business parks are appropriately located and have regard to strategic and adverse effects (policies 1, 2, 3, 4 and 6)
- 2) Policy that seeks to manage staged development (Policy 5).

## **7.3 Significance of this Subject**

A business park is a location where office-type business activities can group together in a park or campus-like environment. This zone enables moderate to intensive office activity and some ancillary services such as gymnasiums, child care and food and beverage outlets. These high amenity and comprehensively planned business areas are located adjacent to the rapid and frequent services network. The zone is designed to recognise the existing business parks of Smales Farm and Central Park. It has a limited future application, as new office activities are expected to locate within and reinforce the roles of the city centre, metropolitan centres and town centres. Where new business parks are proposed, limits are expected to be put in place on the amount of office that can establish within these parks.

The scale and significance of the environmental, economic, social and cultural effects anticipated from the implementation of the provisions is low. The existing large business parks will be able to continue to function and grow. New office development will be encouraged to locate in centres, around centres in the MU zone, and on identified growth corridors.

## **7.4 Auckland Plan**

The Auckland Plan Development Strategy recognises that strengthening Auckland as an international city relies on improved, balanced socio-economic development across Auckland, so that all residents share in its prosperity. It aims to improve economic performance by prioritising innovation and the clustering of activities. To achieve sustainable development, Auckland's continued high population growth needs to be matched to a range of accessible, quality housing and employment choices. The emphasis is on growth in existing and compact urban areas which are served by efficient, safe public transport.

The main area of departure from the Auckland Plan are in the change from a 'centres only' approach to one of 'centres plus', with a recognition of the need for more overall opportunities for business growth, and alternative locations and business typologies.

Relevant Auckland Plan directives include:

*6.1- Plan and provide for sufficient business-zoned land and infrastructure to achieve employment capacity targets and improved economic opportunity.*

- 6.4 - Monitor demand and supply of business land activities in urban and rural Auckland.
- 6.5 - Develop conditions to promote entrepreneurial development and commercialisation of innovation, building on Auckland's unique advantages.
- 6.6 - Support sector precincts and infrastructure development, science and technology parks, and innovation centres for key industries.
- 6.7 - Explore all options to enhance Auckland's key economic sectors, including leveraging council-owned land through joint ventures, public-private partnerships, infrastructure assistance and other forms of collaboration.
- 10.3 - Focus urban intensification in areas that have infrastructure in place or which can be provided in a timely and efficient manner, and close proximity and good walking access to community facilities, open space, high-frequency public transport, centres and business areas.
- 10.8 - Strengthen Auckland's network of metropolitan, town, local and neighbourhood centres so they are well-connected and meet community needs for jobs, housing, and goods and services, at a variety of scales. Auckland's network of centres will be the primary focus for retail and other commercial activity, providing a wide range of outlets in a competitive environment, while limiting out-of-centre retail and office development.
- 10.9 – Develop and manage business areas to complement centres, without undermining their role and function in the centres' network, and to provide for a diversity of opportunities for business and employment growth.
- 10.10 - Business park development should promote clusters of technology and innovation.

## **7.5 Current Objectives, Policies, Rules and Methods**

Limited provision is made for business parks within the operative District Plan sections. Smales Farm in Takapuna and Central Park in Penrose are the two largest and most well-known. Many of the other business parks mix commercial office with warehousing and other light industrial activities. Employment areas around Auckland Airport demonstrate such a mix, as does some of the recent development of Highbrook Business Park. The Unitary Plan applies the precinct planning approach to some business park-like activities. Some existing business parks are at a relatively small scale and can operate in precincts within light industrial areas.

## **7.6 Information and Analysis**

The Business Park zone is based on planning work undertaken by the legacy councils, in creating stand-alone business areas that would have high transport accessibility, a landscaped business campus character, high built amenity standards, and a relatively narrow mix of ancillary activities to support their predominant office activity. They do not have a residential component, but are able to include visitor accommodation, for example a business hotel. The formation of the existing business parks came about as a local interpretation of international approaches to the stand-alone office campus. As legacy niche business zones their continued ability to operate and to expand and adapt is protected, but the zone is expected to have only limited further application.

<b>Document</b>	<b>Purpose/Description</b>	<b>Date</b>	<b>Appendix</b>
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Capacity for Growth Study</i> Auckland Council	Report on residential, business and rural land availability in Auckland	2012	3.4.8

## **7.7 Consultation Undertaken**

See Appendix 3.39.2.

## **7.8 Decision-Making**

See Appendix 3.39.3.

## **7.9 Proposed Provisions**

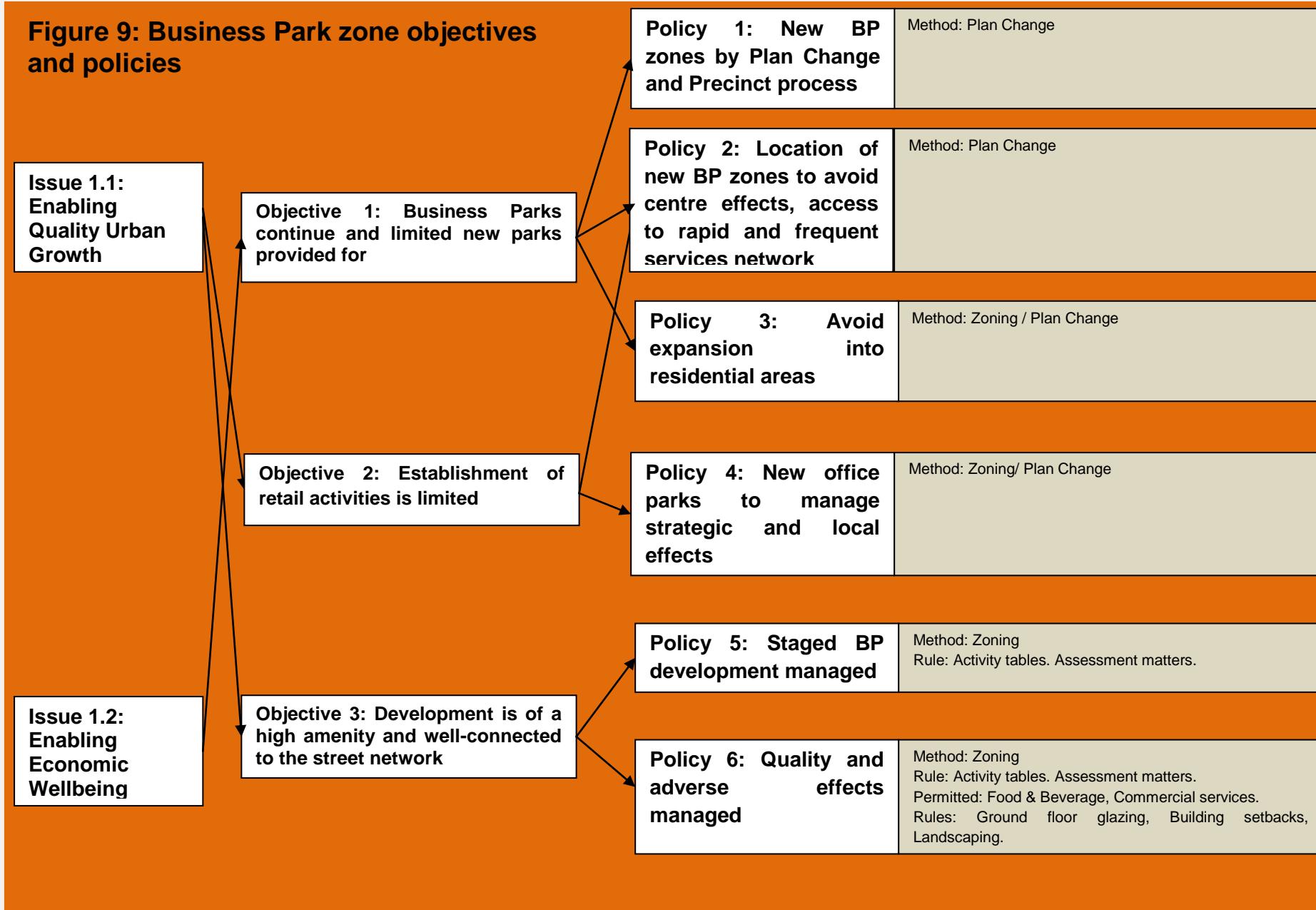
The proposed provisions include a consistent set of bulk and location controls, and requirements for landscaping and Restricted Discretionary activity consideration of building and development design. The Business Park zone is not applied widely across Auckland, but is largely confined to existing Business Parks.

## **7.10 Reference to other Evaluations**

Refer Section 2.10 above.

The following Figure 9 demonstrates the linkages between the issues and the district objectives and policies.

**Figure 9: Business Park zone objectives and policies**



## 7.11 Objectives, Policies and Rules

### 7.11.1 Objectives

The following objectives are proposed:

#### **Objectives**

*1. Existing business parks continue and limited opportunities exist for new business parks for office based employment where they:*

- (a). are comprehensively planned
- (b). avoid adverse effects on the function and amenity of the City Centre, Metropolitan and Town Centre zones and neighbouring zones
- (c). are easily accessible to the rapid and frequent services network.

*2. The establishment of retail activities is limited, except where these are ancillary and support intensive employment activities undertaken within the zone.*

#### **Appropriateness**

The objectives and the associated zone provisions seek to provide recognition of substantial office complexes in limited locations at Smales Farm and Central Park.

The zone recognises and provides for ongoing use and development of these areas, primarily for office activity and ancillary convenience services and food and beverage outlets. Importantly, while the application of the zone is not widespread, Objective 1 is explicit in that new Business Park zones can be established subject to consideration of the wider strategic (urban form, transport, centre vitality) and local (amenity and design) effects.

The zone seeks to provide for office parks in a manner that is complementary and not detracting from the existing centres network. In doing so it aims to ensure that Office Parks are comprehensively planned, and that the full range of activities and functional amenity anticipated within a centre are not able to be duplicated with a Business Park zone (Objective 1), hence limiting the type and scale of retail activities (Objective 2).

It would be undesirable, in terms of impacts on the centres network and overall urban form, as well as pressure and the potential loss of the scarce industrial land resource, to apply a Business Park zone objective, policy and zone framework in an area where there is not a significant existing level of office infrastructure established.

Such an approach:

- assists in recognising and providing for the use, development and protection of physical resources as represented by the existing substantial office complexes at Smales Farm and Central Park;
- is enabling a range of commercial activities that provide for people and communities to be able to further their social and economic well-being in a way, or at a rate as represented by Business Parks, and the alternative office accommodation that such areas represent.
- Lastly, the objectives seek to ensure that activities remain compatible, and that either a proliferation of such Business Parks, and / or diversity of retail activities within existing parks does not occur. Accordingly the provisions provide the requirement to recognise and manage any adverse effects of activities on the environment and at a strategic level on the transport and centres network.

The objectives are also considered in accordance with the following principles of the Act:

S7(b) in that the objectives seek to promote certainty in ongoing economic development provided for by existing commercial office activities within the BP zone. This provides for the continued use of physical resources represented by existing substantial clusters of office development, or where new compatible complexes are proposed.

S7(g) in that the objectives seek to provide for the efficient use of buildings and land within the BP zone. Provisions associated

with the establishment of new BP zones require determination of whether such proposals also are compatible with the efficient use of the transport network, and existing centres network.

S7(c) and s7(f) as the objectives seek to ensure that activities within the GB zone do not occur at the expense of commercial centre vitality and amenity, or with adverse effects on neighbouring zones.

It is noted that the zone is probably less efficient in comparison to providing all office activity within centres, regardless of scale. Accordingly in terms of S7(ba) there may be a slight increase in trip generation, although this is dependent on the proliferation of the application of the BP zone to new areas. Also given that the functional amenity of such zones is narrower than within centres, the extent of social well-being able to be enhanced is somewhat limited.

The objective is useful in that providing for recognition of existing substantial office park complexes there is an appropriate range of provisions for ongoing certainty in the use, development and protection of such facilities. The objectives also are:

- clear that there will be limited application of the zone;
- effective in clarifying in the plan the types of activities intended to be undertaken within the BP zone;
- providing additional capacity to meet anticipated commercial office growth.

The objective is achievable as a clear set of criteria is identified in terms of the application of new BP zones, as well as identifying the role of Business Park zones within the wider context of urban form and transport integration.

### **Objectives**

**Objective 3**  
*Development is of a high amenity value and is well-connected to the surrounding street network.*

### **Appropriateness**

Scale and form of the extent of commercial activity within the zone needs to be of a design quality that is appropriate to the range of uses anticipated within the zone. The market also tends to provide a high value on the quality of buildings (prestige value), compatibility between uses, quality and function of supporting activities (such as cafes, business service and printing support) found within complexes, and substantial access to car parking and the public transport network. Accordingly, it is considered that the objective seeks to identify and provide for those amenity and functional aspects sought within such zones.

Accordingly, the objective seeks to maintain for people and communities that utilise the BP zone, their social, cultural and economic well-being, primarily through ensuring a high level of quality built form, acknowledging the commercial and professional nature of activities undertaken. The health and safety of people and communities is also expected to be provided for, through reasonably high standards to be met in terms of environment nuisance, as would be expected given the extent of public activities anticipated within the zone.

The objective is also considered in accordance with the following principles of the Act:

S7(b) in that the objective seeks to promote certainty in the continued use of physical resources represented by existing larger scale high amenity office complexes.

S7(c) and s7(f) as the objective specifically identifies a high benchmark for amenity values and design within the zone reflecting the anticipated range of activities.

The objective is useful and reasonable in that it recognises that the amenity and character of the zone must be a consequence of the range of activities provided for and market expectations.

The objective is achievable in seeking to create a high standard of amenity and character through the imposition of a range of development standards, as well as requiring a high level of connection to the wider street network, principally through criteria as applied to the consideration of any new BP zones.

### **7.11.2 Policies**

#### Business Park zone: Location and application of new Business Park zones

1. Apply the Business Park zone to new areas by means of a plan change and an associated precinct planning process.
2. Require the location of a proposed new business park to:
  - (a). be within practical walking distance of the rapid and frequent services network
  - (b). not adversely affect the vitality and viability of the City Centre, Metropolitan and Town Centre zones.
3. Avoid expansion of existing and proposed business parks into residential areas.
4. Require a plan change for a new business park to:
  - (a). limit the permitted amount of office space so as not to adversely affect the vitality and viability of the City Centre, Metropolitan and Town Centre zones
  - (b). limit retail to those services which meet the immediate needs of office workers, such as food and beverage
  - (c). limit residential activity except for visitor accommodation
  - (d). demonstrate that the business park will not adversely affect the safe and efficient operation of the transport network
  - (e). demonstrate that a comprehensively planned development and a high standard of visual, landscaped and pedestrian amenity will be achieved
  - (f). control the scale of built development so that it remains compatible with a landscaped high quality business space
  - (g). limit development where environmental or servicing constraints exist, unless these can be adequately mitigated
  - (h). maximise the number and quality of connections through the site where these provide logical links to the local street network, with a priority on pedestrian and cycle routes and avoiding fenced and gated environments.

#### Amenity and transport effects

5. Require that where development of a business park is staged, the different stages should be managed to enhance amenity values and the environment and maintain or reduce the impact on the transport network.
6. Manage the effects of activities within the zone so that the scale of development and level of environmental effects does not degrade the amenity of neighbouring zones.

### **7.11.3 Rules and other methods**

The proposed provisions are summarised in 7.9 above. The Business Park zone is a location where office-type business activities can group together in a park or campus-like environment. This zone enables moderate to intensive office activity and some ancillary services such as gymnasiums, child care and food and beverage outlets. Offices and commercial services are a Permitted Activity, and buildings are a Restricted Discretionary activity. These high amenity and comprehensively planned business areas are located adjacent to the frequent public transport network. Height limit is five storeys (20.5m) and each site requires 20 percent landscaping. Assessment of the buildings is focused on development design, building interface with the public realm, design of car parking, access and servicing.

The zone has a limited future application, as new office activities are expected to locate within and reinforce the roles of the city centre, metropolitan centres and town centres. Where new business parks are proposed, limits are expected to be put in place on the amount of office that can establish within these parks.

#### Business Park zone: Location and application of new Business Park zones

##### **Methods**

- (i). Rules and activity tables for activities within General Business zone as these relate to the extent, type and scale of commercial activities.
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education i.e. Mixed Use Guide, development contributions, codes of practice, LTP, council bylaws.

#### Amenity and transport effects

##### **Methods**

- (i). Rules and activity tables for activities. Rules for nuisance (Section 4.2.5 Lighting, noise, signs).
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education and design guides, development contributions, codes of practice, LTP, council bylaws.

### **7.11.4 Costs and Benefits of Proposed Policies and Rules**

Refer to Table 6 below for the environmental, social, economic and cultural costs and benefits of the policies/ rules.

### **7.11.5 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed policies and methods.
- The evidence base and supporting information enables informed and transparent decision making.
- The risk of not acting is that the proposed policies and rules are required for sustainable management.

## **7.12 Alternatives**

Alternatives are:

1. Preferred
2. Status quo
3. Liberal distribution of the Business Park zone

The proposed preferred alternative is discussed in 7.9 above. The status quo alternative is outlined in 7.5 above.

### **Alternative Three – Liberal distribution of the Business Park zone**

This approach would comprise an objective, policy and rule approach that would provide for large areas of Business Park zones where there may be existing clusters of commercial office activity that is not otherwise be provided for within the zoning framework. Such an approach would vastly increase the extent of where substantial office development, outside of centres, could occur in the future.

Such a zoning approach has the potential to considerably decentralise Auckland's office market and undermine the maintenance and growth of the commercial centres, and in particular the city centre as the city's major commercial centre.

A policy and zone approach that provides for a trend of office decentralisation outside of the centre network will decrease the relative proportion of commercial sector employees in the commercial centres, and the efficiencies and associated commercial activity that are gained with more consolidated office activity within centres. Additional costs include:

- Increased reliance on private motor vehicles, increased energy use, and congestion;
- Loss of industrial land for industrial activities which is difficult to replace;
- Reduced retail expenditure available in commercial centres;
- Greater amenity expectation and potential reverse sensitivity issues.

Office decentralisation does provide a number of benefits, including:

- Reduced centre congestion;
- Higher propensity for employees to have easier access to their place of employment at least in the short term;
- Cheaper development costs, and the ability to provide integrated car parking and landscaping;
- Provision for those office activities that have links to adjacent industrial activities (e.g. office development at the airport); and
- Economic spin-offs for nearby businesses that would provide goods and services to an increasing workforce in the area.

However, this alternative is not focused on social well-being as other sections of the community may be disadvantaged through a loss of viability and vitality to the centres network through the dispersal of commercial office employees. It is recognised that this option may provide for the enablement of economic well-being for individual developers where the zone applies, it is considered that there is a net loss in economic well-being, from impacts to the centres network and the inability to efficiently provide public transport infrastructure. Such an option would not avoid strategic or local adverse effects.

Not recognising and providing for the existing centre network, through appropriately constraining the application of the Business Park zone does not appropriately manage the use, development and protection of existing centres physical resources.

The table below discusses each alternative compared to the preferred alternative.

**Table 6**

	<b>Preferred Alternative</b>	<b>Status Quo Alternative 2</b>	<b>Alternative 3 <i>Liberal distribution of the Business Park zone</i></b>
Appropriateness	<p><b>Description: Location and application of new Business Park zones</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving objectives 1 and 2.</p> <p><b>Description: Activity Compatibility</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policy and the associated methods are the most appropriate to achieving Objective 3.</p>	<p>A business park is a location where office-type business activities can group together in a park or campus like environment. This zone enables moderate to intensive office activity and some ancillary services such as gymnasiums, child care and food and beverage outlets. These high amenity and comprehensively planned business areas are located adjacent to the frequent public transport network.</p>	<p>Such a zoning approach has the potential to considerably decentralise Auckland's office market and undermine the maintenance and growth of the commercial centres, and in particular the city centre as the city's major commercial centre.</p> <p>A policy and zone approach that provides for a trend of office decentralisation outside of the centre network will decrease the relative proportion of commercial sector employees in the commercial centres, and the efficiencies and associated commercial activity that are gained with more consolidated office activity within centres.</p> <p>The approach would not find overall support in Part 2 of the Resource Management Act.</p> <p>It is recognised that this option may provide for the enablement of economic well-being for individual developers where the zone applies, it is considered that there is a net loss in economic well-being, from impacts to the centres network and the inability to efficiently provide public transport infrastructure. Such an option would not avoid strategic or local adverse effects.</p> <p>Not recognising and providing for the existing centre network, through appropriately constraining the application of the Business Park zone does not appropriately manage the use, development and protection of existing centres physical resources.</p>
Effectiveness	<p><b>Description: Location and application of new Business Park zones</b> The policies and their methods (and rules) are effective. The approach principally recognises and provides for the existing 'environment' of these areas which are principally characterised by large scale office complexes.</p> <p>The approach also provides for a significant number of reasons as to why office park locations are desired by the market, including:</p> <ul style="list-style-type: none"> <li>• Better access for clients;</li> <li>• Better car parking;</li> <li>• Higher quality environment (in suburban locations);</li> <li>• Newer buildings;</li> <li>• Better profile and costs.</li> </ul> <p>But that the limited application of such a zone, and relevant controls on the range of (principally retail) activities would reduce the opportunities for adverse effects on the transport or centres network.</p> <p>Smaller scale retail is primarily provided for in the centres network. The efficient and sustainable operation of the centres network is maintained and enhanced on the basis of a critical mass of retail and office activity in-centre. Accordingly, the provisions limiting smaller scale retail and all office activities are seen as effective and appropriate for meeting objectives 1 and 2.</p>	<p>Effectively provides a niche employment environment.</p>	<p>The approach would not be effective in that does not recognise and provide for the existing physical resources represented by the centre network and the consolidation strategy associated with higher density development around these. The approach would also provide for the regional dispersal of commercial office activity.</p>

	<p><b>Description: Activity Compatibility</b> The policies and their methods (and rules) is considered to be effective. The application of high amenity expectations within the BP zone is necessary in terms of the outcomes sought and the likely users of these zones. The provisions identify the basis by which amenity and character can be maintained and enhanced for staged developments through the need to consider the amenity, environment and impact on the transport network. Such an approach provides certainty and compatibility between activities anticipated in the zone, but such outcomes should also be applied to existing BP zones that are not staged.</p>		
Efficiency	<p><b>Description: Location and application of new Business Park zones</b> The policies and their methods (and rules) can be implemented for at a moderate cost. These are largely associated with lost opportunities for being able to direct all growth in commercial office activities into the centres network.</p> <p>In real terms the infrastructure and corresponding activity undertaken at the existing BP is applied to effectively 'sunk costs' (existing larger format retail offers), and accordingly there is no increased costs in terms of lost opportunity to the centres network or impacts on the transport network. A limited application of new BP zones would also moderate the extent by which such decentralisation is expected to have ongoing impacts on the economic activity within the centres network that is not compensated for in its regional relocation.</p> <p><b>Description: Activity Compatibility</b> Maintaining and enhancing a quality urban environment was a key message within the Auckland Plan, and is broadly supported by the wider community. There are minimal costs associated with the requirements for a high level of amenity and reduced impact on the transport network, whereas the social and economic benefits in terms of a high quality urban amenity are considerable.</p>	<p>Business parks are currently efficient providers of commercial office business activity, and where close to frequent public transport they have a relatively efficient accessibility. However, they have an inefficient lack of integration with other business locations, and with supporting commercial services, and social, recreational and community facilities. The lack of a substantial residential component reinforces their role as an employment destination requiring separate trip-making.</p>	<p>This option can be implemented at a substantial strategic cost, principally to those who rely on the existing network of centres to provide for their social and economic well-being.</p> <p>There are also consequential and cumulative impacts which ultimately would be inconsistent with a desired goal of seeking a compact urban form to accommodate growth.</p>
Costs	<p><b>Description: Location and application of new Business Park zones</b></p> <p><b>Social:</b> <i>to the community:</i> (Limited) social interaction opportunity costs where substantial office growth is otherwise provided for within centres (diminished where proliferation of new zones is limited). -Limited social and functional amenity within BP zones. -Can increase traffic congestion around BP zones, albeit Smales Farm and Central Park are well connected to road network and PT initiatives. <i>to the council:</i> No material social costs <i>To business owners:</i> No material costs are anticipated from these policies.</p> <p><b>Economic:</b> <i>to the community:</i> No material economic costs. <i>to the council:</i> Need for diversion of transport network capital expenditure from in-centre mitigation to address BP zone network / access issues where new BP zones are established. -Opportunity cost for public transport efficiencies (recognising that new BP zones may not be easily accessible by PT in comparison to in-centre locations). <i>To business owners:</i> Some limits in commercial opportunities. -Compliance with local environmental standards.</p> <p><b>Environment:</b> Can dilute economic activity outside of commercial centres (limited through restrictions on the extent and number of BP zones)</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Description: Activity Compatibility</b></p> <p><b>Social:</b> Requirement to enhance amenity may result in lesser outcomes for the public realm where brownfield redevelopment occurs.</p> <p><b>Economic:</b> <i>to the community:</i> No material economic costs <i>to the council:</i> Administration costs associated with the extent of applications associated with application of design requirements and staging requirements.</p>	<p>Costs to the centres vitality and function as large proportions of employment are extracted to separate business park locations, which then only have a wide range of supporting goods and services, social, recreational and community facilities available by travelling.</p> <p>Some existing 'business parks', such as those at Highbrook and around Auckland Airport, include large components of logistics activities, with warehousing and distribution and manufacturing. The higher (variable) standards of physical amenity in their surroundings can be a less efficient use of effectively a light industrial land resource.</p>	<p>Some compliance costs, in terms of ensuring that amenity and reverse sensitivity issues are addressed. An anticipated increase in the extent of incompatible activities at the interface between zones.</p> <p>Potentially higher costs associated with transport infrastructure, to both the council and business owners, in terms of both maintaining road safety and capacity, as well as duplicating public transport infrastructure.</p> <p>Effects on existing centres, thus disenabling people and communities who rely on those centres.</p> <p>Increased congestion on key roads.</p> <p>Loss of scarce industrial land resource and a consequential reduction in production employment and industrial GDP.</p>

	<p><b>To business owners:</b> Restrictions imposed through design conditions can limit opportunities for development of sites.  -Increased development costs for ensuring higher amenity and quality of design achieved – likely to be imposed by increased rental requirements.</p> <p><b>Environment:</b> Potential risk, is the current absence of a policy that specifically relates to design, appearance and amenity for existing BP zones.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p>		
Benefits	<p><b>Description: Location and application of new Business Park zones</b></p> <p><b>Social:</b>  <i>to the community:</i> Existing centres not adversely affected by current application of BP zone activity, thus continuing to enable people and communities who rely on existing centres for their social and economic well-being.  <i>to the council:</i> Can provide for amenity improvements.  <i>to business owners:</i> No material social benefits.</p> <p><b>Economic:</b>  <i>to the community:</i> Provides alternative locations for employment which may be more accessible to those living in close proximity.  <i>to the council:</i> Integration of infrastructure and land use where new BP zone application can be carefully considered.  <i>to business owners:</i> Recognises and provides for ongoing use and certainty of existing large scale office complexes at Smales Farm and Central Park.  -Benefit to commercial offices whose activities are assisted by higher amenity surroundings, or by easy access to supportable services.  -Provides some release valve to accommodate growth in the commercial office market.</p> <p><b>Environmental:</b> Limited scope for adverse effects on the function and amenity of existing centres.  Can improve amenity through assisting in re-investment.  Addresses strategic (centre vitality, transport network).</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Description: Activity Compatibility</b></p> <p><b>Social:</b>  <i>to the community:</i> Can reduce reverse sensitivity, interface clashes between business and any adjoining residential activities, particularly in relation to streetscape appearance, noise, and glare.  -Where successful enhances the quality of the local environment and vitality of the immediate area.  <i>to the council:</i> Likely decrease in nuisance disputes between stages of development.  <i>to business owners:</i> Provides certainty in the amenity, design and nuisance expectations of future staged developments.</p> <p><b>Economic:</b>  <i>to the community:</i> Improved amenity where reinvestment occurs.  <i>to the council:</i> No material economic benefits.  <i>to business owners:</i> Improved amenity and functioning of a zone is likely to have flow on effects to commercial opportunities and leases.  -Increased certainty in terms of the physical resources associated with business activity within the zone.</p> <p><b>Environmental:</b> Overall managed risk to people and communities' health and safety and wellbeing through managing nuisance effects, and providing standards for maintaining character and amenity as these relate to staged developments.  -A high standard of visual amenity and character for staged developments.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>	<p>The benefits of the current business (office) parks include that they provide a business and employment niche that is attractive to parts of the market. Without these business parks some of that type of 'campus' commercial business may have sought other locations outside Auckland.</p> <p>Business parks are able to offer a high level of built environment amenity, with landscaped surroundings, as a pleasant work environment.</p>	Fewer consenting and administration costs. Provides increased certainty to those which have sunk investment into existing commercial office operations. Increase in opportunities to provide for commercial office activity in a variety of locations. Those living in close proximity (or undertake efficient pass-by trips) may be have better access to commercial sector employment

Risks	<p><b>Description: Location and application of new Business Park zones</b> The key risk to the approach is the extent to which the BP zone is applied.</p> <p><b>Description: Activity Compatibility</b> There are no material risks with the approach.</p>	<p>The key risk of the status quo approach is that centres are unable to achieve their potential, and employment activity becomes increasingly dispersed, requiring additional transport provision.</p>	<p>The key risk is the extent by which such provisions would result in the inefficient provision of commercial office activity in Auckland, and reduce the light industrial land resource.</p>
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### **7.13 Conclusion**

Office activity is provided for within the centres network and is encouraged in both new purpose-built office developments, and through the refurbishment of existing buildings. Current mechanisms for encouraging these developments within centres include not requiring on-site car parking, not requiring an integrated transport assessment for new substantial office developments, and public and private owned and operated car parking facilities. While there is an economic differential between building large scale office developments in the centres network in comparison to lower density lower cost options on the fringe of centres or along major corridors, there is a regulatory context for limiting the extent of office distribution. The provision of only a limited number of Business Park zones provides a rational mechanism to ensure that the strategic aims of the Auckland Plan can be met. It is appropriate that the application of the Business Park zone does not proliferate to such an extent that it would undermine the role and function of centres.

## **8 Overview of Sections 3.10 (Light Industry zone) and 3.11 (Heavy Industry zone) in zone objectives and policies**

### **8.1 Subject Matter of this Section**

The purpose of Sections 3.10 and 3.11 is to recognise, provide for and manage the specific business distribution issues that relate to the spatial location, form and types of development within the respective industrial zonings. A key goal is the acknowledgement of the scarce resource industrial land is within Auckland, as well as introducing ways to manage emerging issues such as the provision and integration of land use with infrastructure, and appropriate limitations on the scale and extent of retail and office activities.

### **8.2 Resource Management Issue to be Addressed**

As with Section 3.1 ‘Enabling Economic Wellbeing’ two resource management issues are addressed through these provisions. These are:

- **Issue 1.1** Enabling quality urban growth; and
- **Issue 1.2** Enabling Economic well being;

These issues seek to be addressed by the objectives for each of the industrial zonings in a manner that:

- (a) Distinguishes a function and role for the light industry and heavy industry zones, and identify the types of activities that are to be avoided where these may diminish that role (objectives 1 and 2 of 3.10 (Light Industry), and objectives 1-3 of 3.11 (Heavy Industry);
- (b) Ensuring an appropriate amenity and managing effects on the environment. (objectives 3 and 4 of 3.10 (Light Industry), and Objective 4 of 3.11 (Heavy Industry))

### **8.3 Significance of this Subject**

There is not so much a significant policy shift as a firming of the protection provided to industrial land against other prospective uses, recognising it as a scarce resource. The provisions also introduce air quality overlays to minimise adverse effects on adjacent land uses.

The Light Industry zone provides for light industrial activities that do not generate objectionable odour, dust or noise emissions. This includes light manufacturing, production, logistics, storage, transport and distribution activities.

Sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate. An exception is made for trade suppliers, service stations, motor vehicle sales and garden centres, which may locate in the zone subject to location and traffic considerations.

The Heavy Industry zone provides for industrial activities that may produce objectionable odour, dust and noise emissions. Air quality emissions standards that are different to the rest of Auckland will often apply (refer to Section 32 report for Air Quality Transition overlays). A key attribute of the zone is that it contains sites large enough to accommodate large-scale low intensity industrial activities.

Sensitive activities are not appropriate in the zone and buildings are expected to have a mainly functional standard of amenity. The zone is typically located close to key freight routes.

Planning for additional greenfield business land is extremely important to Auckland’s ongoing economic prosperity given it has been demonstrated that there is a critical shortage

of new greenfield land for business purposes (particularly for land-extensive industrial activities).

New opportunities need to be planned and brought into the planning pipeline in a timely manner as currently available capacity will steadily diminish over time. Business land proposals can take around eight years to get from a decision to undertake rezoning of land to the actual on the ground implementation, mainly due to the length of time it takes to get through the planning system.

At the time the Auckland Plan was being developed land use modelling and supply/demand forecasts were predicated on the last Auckland-wide Capacity for Growth Study that was reported in 2010. This study estimated that there was 6,814 hectares of business zoned land in the Auckland metropolitan area, just over half (53%) being available for industrial activities (3,585ha), 35% available for Commercial activities (2,405ha) and 10% available for a mix of both activities (680ha). A further 144 hectares was not classifiable.

The study assumed there would be capacity for 2,406 hectares of business zoned land, using a point-in-time estimate of vacant land, vacant potential and potential brownfield redevelopment. However, further analysis reduced this assumed capacity by 453 ha given market perspectives that some of the capacity estimated was highly constrained.

This estimation of capacity informed the Auckland Growth Model that assessed the potential spatial take-up of growth across Auckland. An interim analysis of Auckland employment growth work derived the potential need for an additional 1,400 ha of business land to meet the forecast employment growth in Auckland up to 2041 given modelled capacity deficits in parts of the region (Auckland Plan p 157).

The stated need for 1,400 ha of additional greenfield business land was adopted as the strategic benchmark for future business land provision in the Auckland Plan. This provision is made up of a demand for 1,000 ha for new industrial activities and 400 ha for new commercial activities.

It was noted that most of this land requirement for new industrial activities was deemed to be in the large industrial areas of southern and eastern parts of Auckland given the expected future employment demands were outstripping land capacity in these areas. This supported previous studies that highlighted the critical need for new industrial land in the region.

Based on the latest projections from Auckland Council's Economic Future Model, total employment in the industrial sector will rise from 202,000 employees in 2011 to nearly 255,000 employees in 2031. This is an increase of 53,000 employees (or 26%) over the next twenty years.

In addition, see Appendix 3.4.4 for a brief discussion of industrial land demand and supply.

#### **8.4 Auckland Plan**

Further to the context outline above the Auckland Plan provides the strategic direction for managing business land in the region. It states:

*There is concern over the scarcity of industrial land to meet this forecast demand. Nearly one third of industrial land has been used for non-industrial purposes over the past decade, principally for retail, office and residential use. Auckland's restricted store of industrial land will be actively managed to ensure that industrial activity – critical to Auckland's economic performance – is not impeded. This requires the safeguarding of existing industrial-zoned sites, effective reuse of brownfield sites, and the provision of new industrial-zoned land in suitable locations. Auckland will probably require around 1,000 hectares of additional business-zoned land (in greenfields) to meet expected growth in industrial activities over the next 30 years. This land requirement is included in the identification of*

*greenfield areas for investigation. The release of greenfield land will be managed, to ensure an adequate and phased supply of industrial land across the region (para 390)*

*Changes in the way business operates, driven by advances in technology and information systems, will impact on land use and future business land needs. Further analysis will determine future requirements for freight hubs and distribution centres within Auckland. Monitoring of business land uptake and demand will ensure future planning is effective (para 391)*

Auckland Plan economic priorities include growing a business-friendly and well-functioning city; developing an innovation hub of the Asia-Pacific Rim; becoming internationally connected and export-driven; enhancing investment in people, to grow skills and a local workforce; and developing a creative, vibrant international city. Relevant Auckland Plan directives include:

*6.1- Plan and provide for sufficient business-zoned land and infrastructure to achieve employment capacity targets and improved economic opportunity.*

*6.2 - Ensure an efficient and effective regulatory process with strong public – private relationships, and implement a streamlined regulatory process that offers reduced uncertainty around cost, timing and outcome.*

*6.3 - Protect, enhance and improve business-zoned areas and business improvement districts.*

*6.4 - Monitor demand and supply of business land activities in urban and rural Auckland.*

*6.6 - Support sector precincts and infrastructure development, science and technology parks, and innovation centres for key industries.*

*6.7 - Explore all options to enhance Auckland's key economic sectors, including leveraging council-owned land through joint ventures, public-private partnerships, infrastructure assistance and other forms of collaboration.*

*7.7 Minimise reverse sensitivity and exposure associated with emissions.*

*10.1 - Adopt a Rural Urban Boundary in Auckland's Unitary Plan that provides for land capacity over the next 30 years.*

*10.2 - Plan for a seven-year average of unconstrained development capacity (zoned and serviced with bulk infrastructure) at any point in time with a minimum of five years' and a maximum of 10 years' capacity.*

*10.4 - Locate and develop greenfield areas as sustainable liveable neighbourhoods in a way that demonstrates the most efficient use of land and provides or supports local employment opportunities.*

*10.8 - Strengthen Auckland's network of metropolitan, town, local and neighbourhood centres so they are well-connected and meet community needs for jobs, housing, and goods and services, at a variety of scales. Auckland's network of centres will be the primary focus for retail and other commercial activity, providing a wide range of outlets in a competitive environment, while limiting out-of-centre retail and office development.*

*10.9 – Develop and manage business areas to complement centres, without undermining their role and function in the centres' network, and to provide for a diversity of opportunities for business and employment growth.*

## **8.5 Current Objectives, Policies, Rules and Methods**

The operative plans manage air quality through the RPS and the Regional Plan: Air, Land and Water. The operative sections of the Auckland Council District Plan (Rodney, North Shore, Waitakere, Manukau, Papakura, Franklin, Auckland City Isthmus, Auckland City Central Area) all have business zones for industrial activities. Areas of heavy industry have zone provisions allowing for higher levels of emissions. The sections vary in the bulk and location controls applying to industrial development and buildings. They also vary in the activity classification of land uses appropriate to the zones and not considered appropriate to industrial zones. There are a range of minimum site sizes possible through subdivision of industrial land.

## **8.6 Information and Analysis**

Auckland Council receives regular (quarterly and half yearly reports) commentary from market analysts regarding the supply and demand of business land in Auckland (quarterly 'Auckland MarketView' and half-yearly 'Auckland Property Market Outlook' produced by CBRE). Such commentary provides council with up-to-date information regarding the state

of the property market and indirectly how the economy is progressing. Business land uptake could begin to return to pre-2008 levels where business land consumption was running at over 100 ha per year, compared to less than 30 ha per year from 2009 to 2012. From 1996 to 2012 the overall average has been 92 ha per year. A new development cycle will put pressure on business land supply.

Based on the capacity estimated there is land potential for the next 30 years of business development. However the piecemeal nature of sites available (i.e. a majority of the vacant sites in the urban area are below 1,000 m<sup>2</sup>) means that this supply will not meet all developer expectations especially for land-extensive industrial activities. The provision of 1,400 ha of new business land is predicated on 1,000 ha of this total being available for industrial activities, given this was the specific sector that had the most significant capacity constraints. Further monitoring is required to assess whether the Auckland Plan target of the provision of 20 years of business land capacity is currently achievable.

<b>Document</b>	<b>Purpose/Description</b>	<b>Date</b>	<b>Appendix</b>
<i>Industrial Land Demand</i>	Short background to regional industrial land requirements, based on Property Economics 2009 predictions	2013	3.4.4
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Group 1 Additional Greenfield Land Requirements, 2001-2031.</i> Market Economics	Projection of industrial greenfield land requirements	2007	3.4.7
<i>Capacity for Growth Study</i> Auckland Council	Report on residential, business and rural land availability in Auckland	2012	3.4.8
Auckland Council and Market Economics Economic Futures Model	Model used to project future economic outputs in region.  Not attached as an appendix as the model outputs differ based on different assumptions and inputs to the model.	2013	-

## **8.7 Consultation Undertaken**

See Appendix 3.39.2.

## **8.8 Decision-Making**

See Appendix 3.39.3.

## **8.9 Proposed Provisions**

The Light Industry zone provides for light industrial activities that do not generate objectionable odour, dust or noise emissions. This includes light manufacturing, production, logistics, storage, transport and distribution activities.

Due to the industrial nature of the activities, sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate. An exception is made for trade suppliers, service stations, motor vehicle sales and garden centres, which may locate in the zone subject to location and traffic considerations. The

activity classification distinguishes between activities needing to locate in an industrial zone and those which can locate in other zones.

The Heavy Industry zone provides for industrial activities that may produce objectionable odour, dust and noise emissions. Air quality emissions standards that are different to the rest of Auckland will often apply. A key attribute of the zone is that it contains sites large enough to accommodate large-scale low intensity industrial activities.

Sensitive activities are not appropriate in the zone and buildings are expected to have a mainly functional standard of amenity. The zone is typically located close to key freight routes.

The building height limit is increased in some areas of Auckland, to 20m where not near a residential or open space zone. Some sections of the operative District Plan allow unlimited height in industrial zones, for operational purposes. The Unitary Plan makes infringing the 20m height limit a Restricted Discretionary activity.

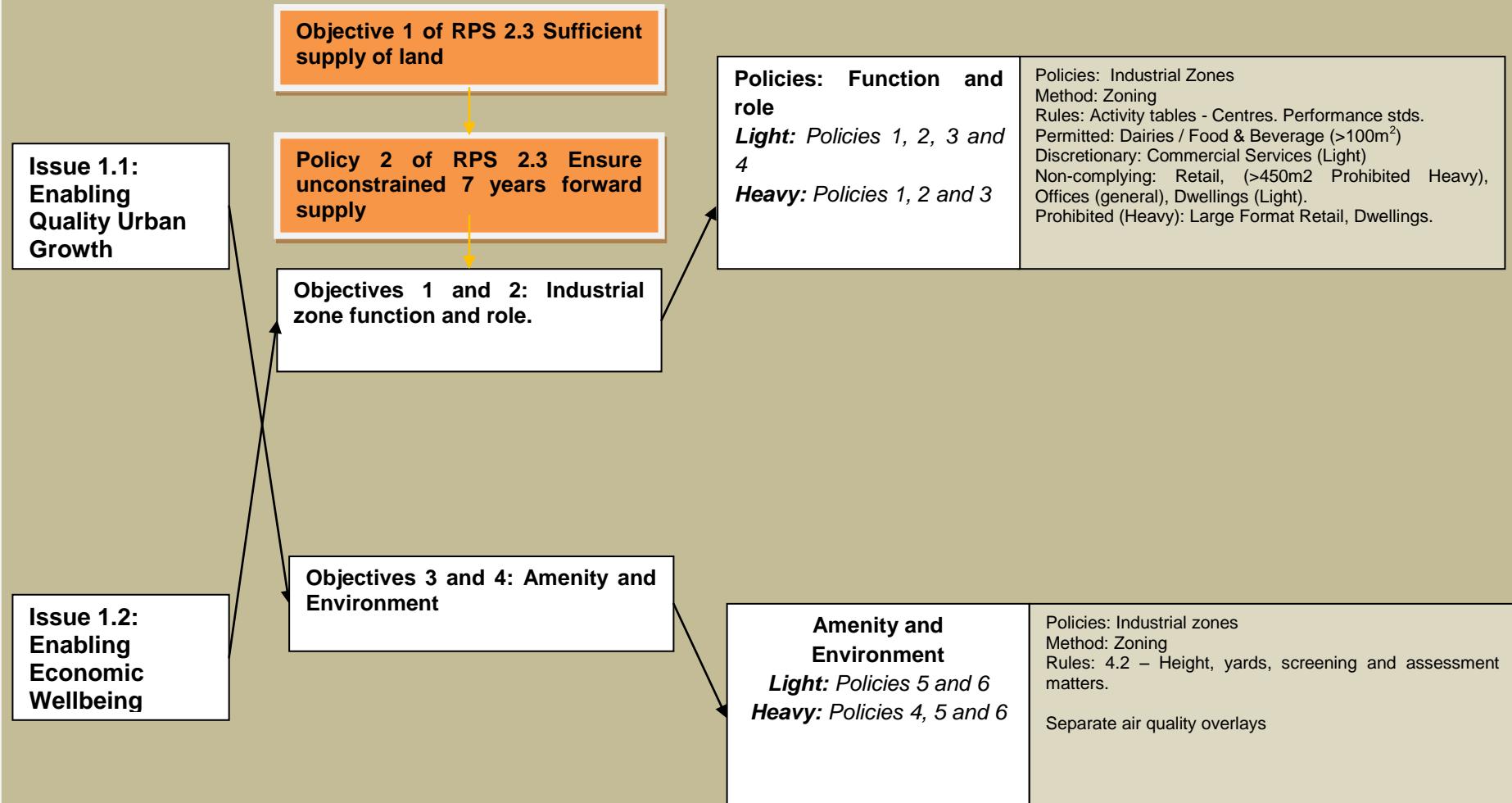
Subdivision of industrial land has minimum average site sizes in the Light and Heavy Industry zones (2000 and 5000m<sup>2</sup> respectively), to ensure a continuing supply of large industrial sites for new development and redevelopment. Balanced by these minimum average site sizes there are also smaller minimum site sizes (1000 and 2000m<sup>2</sup> respectively) to allow for some more compact development and activities supporting the industrial activities, such as dairies, food and beverage retail, and service stations.

## **8.10 Reference to other Evaluations**

Refer Section 2.10 above.

The following Figure 10 demonstrates the linkages between the RPS issues, objective and policy and the district objectives and policies.

**Figure 10: Industrial Zones – Light and Heavy**



## 8.11 Objectives, Policies and Rules

### 8.11.1 Objectives

The following objectives are proposed:-

#### Objectives

##### *Light Industry*

1. *Light industrial activities locate and function productively within the zone.*
2. *The establishment of activities that may diminish the efficiency and functionality of the zone for industrial activities is avoided.*

##### *Heavy Industry*

1. *The efficiency of heavy industry is maximised without being unreasonably constrained by other activities.*
2. *Heavy Industry zone land and activities, that are required to locate their because of the nature of their operation, are protected from the encroachment of: (a) sensitive activities such as residential, community, education or medical facilities; (b) commercial activities that are more suited to other business zones.*
3. *The supply of large sites is not reduced by inappropriate fragmentation of those sites by subdivision.*

#### Appropriateness

This approach gives effect to the purposes and principles contained in Part 2 of the Act.

Auckland's industrial land resource is scarce and much of the existing available land is fragmented to a degree that is not easily utilised by such large space extensive industries.

Based on the most recent Capacity for Growth Study (2012), business zoned land parcels that are wholly vacant make up around 22% of Auckland's business land capacity. However, the Capacity for Growth Study outlines that 60% of vacant business parcels in the urban area are less than 1,000 m<sup>2</sup> in size. A very small portion of vacant business parcels are over one hectare, therefore there is a distinct lack of large vacant sites. Coupled with a significant shortage of vacant greenfield land for business use in the region, options for firms looking to locate large scale, land-extensive activities in Auckland are limited.

It is important that the land use is managed in a way that ensures it provides for the future industrial growth demands of Auckland over the projected planning period. Previous predictions have estimated that an additional 680 to 720 hectares of greenfield land would be needed to meet demand between 2011 and 2031 (Group 1 Additional Greenfield Land Requirements, 2001-2031 Market Economics for the Auckland Regional Council, 2007). However, the most up-to-date projections that accounted for the impacts of the Global Financial Crisis beginning in 2008, estimated that at least 1,000 hectares would be needed up to 2041 (Auckland Plan p 157). The latter informed the approach adopted in the Auckland Plan which seeks to actively manage the existing resource of industrial land and to ensure there is provision of new industrial land.

To do this, new greenfield land needs to be provided, brownfield opportunities incentivised, and the integrity of uses should be maintained to promote industrial activities, as any significant loss of industrial zoned land to commercial or residential uses would play a substantial role in reducing the overall industrial land resource, increase residual land values, and also generate inefficiencies in the use and development of servicing infrastructure.

Restricting large format retail activities in particular, due to the scarcity of the industrial land resource, has previously been seen as effective in other districts of New Zealand. In *Affco New Zealand Ltd v Napier City Council* (W082/04), the Court was considering a resource consent application for a large format retail activity in an industrial zone. The Environment Court held that the application should be declined, due to its impact on the integrity of the plan and its lack of promotion of sustainable management [para 42]:

*"Because of its effects, industry needs to go into an industrial zone. Large format retailing does not need to go into an industrial zone. It is an activity which has traffic generation issues (even if they may be largely unquantifiable in advance) but does not produce noxious effects, such as odour, noise, vibration or dust. It can be accommodated within a much wider spectrum of land categories than any true industrial activity. It cannot be assumed that sites or activities*

*are interchangeable."*

Retail and office activity should be limited in scale and type and be ancillary to industrial activity within the Light Industry zone except where adjoining identified growth corridors, and generally constrained within the Heavy Industry zone. There are three broad reasons for this:

- The industrial zones are designed to allow industrial activity. It is not sustainable to have retail and office activity occupying industrial land and displacing industrial activity that cannot locate in other zones. This will lead to the premature uptake of the valuable and scarce industrial resource.
- Retail and office activity, on their own, are more sensitive to the level of effects associated with industrial areas. If retail and office activity establish in the industrial areas, they can put pressure on their industrial neighbours to either meet higher amenity expectations of retail activities, or alternatively leave the area.
- Retail and office activity is provided for in the commercial centres network. The efficient and sustainable operation of commercial centres is maintained and enhanced on the basis of a critical mass of retail and office activity in-centre. If these activities are allowed to locate elsewhere, it can lead to the decline of the centre with all the adverse economic and social effects that creates for the community.

Ancillary retail or office activity associated with industrial activities is recognised and enabled as being core components of modern industrial developments. Trade supplier retail is also provided for as this activity is seen as being an appropriate inclusion in the Light Industry zone due to opportunity costs and the inability to secure sites within the centres network.

The objectives promote the purpose of the RMA by managing the use, development and protection of natural and physical resources in a way and at a rate which enables people and communities to provide for their social, economic and cultural well-being.

The Light Industry zone provisions essentially allow for all kinds of general industrial activity. This area is where it is anticipated that the majority of industrial growth will take place in the future. Zoning provisions reflect the general nature of activity anticipated in the location, with specific restrictions only applying to retail and office activity. Some retail is provided for, recognising that not all retail activities can be accommodated in centre, and where Light Industry zones adjoin identified growth corridors.

The Heavy Industry zone relates to areas where more noxious and incompatible production and manufacturing activities are provided for. The zone provisions accordingly provide a very high threshold to the establishment of activities which may generate reverse sensitivity effects and reduce the scarce land resource. Large format retail activities and dwellings are prohibited, on the basis that such a status is considered to be the most appropriate of the options available, and it is not considered that such would lead to any unintended consequences.

In the Heavy Industry zone, air quality emissions standards are different to the rest of Auckland. It is a low amenity air quality area.

Two overlays apply in and around the zone, to protect existing activities sensitive to air discharges near the zone from harm and to avoid further development of activities sensitive to air discharges near the zone that may create reverse sensitivity issues. For discussion of these overlays, see the S32 on Air Quality Transition Buffers.

The objective does not specifically refer to safeguarding the life supporting capacity of air, water, soil or ecosystems, rather this aspect relies on the other objectives contained within the Unitary Plan. The objective does not explicitly reference the need to avoid, remedy or mitigate adverse effects, rather the reference to protect such areas from encroachment where such activities are more appropriately enabled elsewhere. There are also objectives and policies within the Air Quality overlays (Air Quality – Sensitive Activity Restriction and Air Quality – Industry Transition) which apply to the Heavy Industry zones.

The objectives are also considered in accordance with the following principles of the Act:

S7(b) in that the objectives seek to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources associated with the Light and Heavy Industry zones.

S7(g) as the objectives recognise the finite characteristics of physical resources associated with the industrial zones.

S7(c) and s7(f) in that the objectives recognise that the amenity generated by activities within the industrial zones, and the qualities of these environments may not be appropriate for more sensitive activities, and seeks to provide for such sensitive activities in more appropriate locations.

The objective is useful in that it recognises the value of the industrial land resource, and the importance that its efficient utilisation plays in terms of Auckland's GDP, economic growth and diversity of employment opportunities.

The policy is achievable with the Unitary Plan providing a two-tiered approach to the enablement and provision of industrial activities, recognising the differing roles and environmental impacts associated with each.

### **Objectives**

#### *Light Industry*

*3. Adverse effects on the natural environment and general amenity, both within the zone and on adjacent areas, are managed.*

*4. Development avoids adverse effects on the amenity of adjacent public open spaces and residential zones.*

#### *Heavy Industry*

### **Appropriateness**

The objectives provide for managing certain health and safety effects, principally through recognising that activities locating within these zones will generate nuisance effects which may not be benign, but will be managed to ensure that thresholds associated with public health and the character of these environments are maintained. Accordingly, a reasonable level of amenity is to be maintained, and accordingly there will be a need to avoid, remedy or mitigate adverse effects which are not compatible with such values.

The objectives differentiate between the amenity values anticipated in the Light vs. Heavy Industry zones, accordingly providing policy and method recognition for associated nuisance and amenity performance standards.

The objectives also provide for the health and safety of adjacent areas through avoiding, remedying or mitigating adverse effects through

<i>4. Adverse effects on the natural environment and general amenity, both within the zone and on adjacent areas, are managed.</i>	provisions seeking setbacks, landscaping and stronger controls on nuisance impacts such as noise where near residential zones.
	The objectives are also considered in accordance with the following principles of the Act:
	S7(b) in that the objectives seek to promote certainty in ongoing economic development which will provide for the continued use of natural and physical resources associated with the industrial zones.
	S7(c) and s7(f) in that the objectives differentiate between levels of amenity generated within the Light and Heavy Industry zones and seek to manage activities to maintain the amenity and quality of these environments.
	The objectives are useful and reasonable in that they recognise that the anticipated amenity in these areas correlates to that of 'working' or productive environments, and accordingly a lower standard of amenity and environmental quality can be expected, with a need to avoid reverse sensitivity effects from incompatible activities establishing within these zones.
	The objectives are achievable in seeking to implement a level of amenity and environmental standards appropriate within working environments, whilst also ensuring that adverse effects at the interface with more sensitive zones are managed.

### **8.11.2 Policies**

#### Function and role

These provisions can be considered collectively as generally containing the following policy provisions.

**Light:** Policies 1, 2, 3 and 4

**Heavy:** Policies 1, 2 and 3

These provisions collectively seek to define and apply a role and function to their respective zones. The main policy difference is that within the Light Industry zone there is recognition that while there is a need to avoid incompatible activities within the zone, there is a narrow range of retail uses that may be better suited to a Light Industry zone location, or where such activities may provide for the local worker population. Within the Heavy Industry zone, a far more prescriptive limitation on sensitive and non-industrial activities is applied.

#### Amenity and Environment

These provisions can be considered collectively as generally containing the following policy provisions.

**Light:** Policies 5 and 6

**Heavy:** Policies 4, 5 and 6

These provisions collectively seek to ensure a design and amenity response commensurate to the role, function and diversity of activities anticipated within each of the industrial zones.

### **8.11.3 Rules and other methods**

The proposed provisions are summarised in 8.9 above.

The activity table controls the activities locating in the Light and Heavy Industry zones. The Light Industry zone provides for light industrial activities that do not generate objectionable

odour, dust or noise emissions. This includes light manufacturing, production, logistics, storage, transport and distribution activities.

Due to the industrial nature of the activities, sensitive activities such as residential, office or retail activities that are not related to the predominant use on-site are not appropriate and are generally excluded. An exception is made for trade suppliers, service stations, motor vehicle sales and garden centres, which may locate in the zone subject to location and traffic considerations. The activity classification distinguishes between activities needing to locate in an industrial zone and those which can locate in other zones.

The Heavy Industry zone provides for industrial activities that may produce objectionable odour, dust and noise emissions. Air quality emissions standards that are different to the rest of Auckland will often apply. See the S32 on Air Quality Transition Buffers for further discussion.

The building height limit for Light and Heavy Industry zones is increased in some areas of Auckland, to 20m where not near a residential or open space zone. Some sections of the operative District Plan allow unlimited height in industrial zones, for operational purposes. The Unitary Plan proposes that infringing the 20m height limit would be a Restricted Discretionary activity.

#### Function and role

##### **Methods**

- (i). Rules and activity tables for activities within the industrial zones as these relate to the extent, type and scale of commercial (retail and office activities) and residential activities.
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### Amenity and Environment

##### **Methods**

- (i). Rules and activity tables.
- (ii). Assessment criteria.
- (iii). Other means, including council policy, conditions of consent, education, development contributions, codes of practice, LTP, council bylaws.

#### **8.11.4 Costs and Benefits of Proposed Policies and Rules**

Refer to Table 7 below for the environmental, social, economic and cultural costs and benefits of the policies/ rules.

#### **8.11.5 Adequacy of Information and Risk of Not Acting**

- It is considered that there is sufficient information on which to base the proposed policies and methods.
- The evidence base and supporting information enables informed and transparent decision making.
- The risk of not acting is that the proposed policies and rules are required for sustainable management. Land suitable for industry is being lost to other uses and new land only slowly becoming available on the periphery of the urban area. Industrial activities also need protection against reverse sensitivity effects.

#### **8.12 Alternatives**

Alternatives are:

1. Preferred

2. Status quo
3. Limiting all retail and commercial activity within the industrial zones
4. A liberal approach

The proposed preferred alternative is discussed in 8.9 above. The status quo alternative is outlined in 8.5 above.

The following is an evaluation of the potential responses to the issue through the proposed provisions

**Alternative Three – Limiting all retail and commercial activity within the industrial zones**

Such an approach was rejected as being impractical and overly restrictive; as such an approach would ultimately reduce social and economic enablement across the wider district. Some commercial businesses serve a local need, or are an integral component to a more industrial activity, and others have a narrow client base or require a site that cannot be suitably provided within commercial centres

**Alternative Four – Liberal approach to land use within industrial zones**

This approach was rejected as being unable, in the short term, to meet the requirements of Part 2 of the RMA. Unconstrained industrial activities would be unable to avoid, remedy or mitigate their adverse environmental effects.

In the longer term, and in an ad-hoc manner across Auckland, a liberal approach to land use would allow the land to be converted to activities paying a higher rent. This would effectively deplete the supply of land for industrial activities, which would need to be constantly moving further away from urban land and its resident workforce.

The table below discusses each alternative compared to the proposed alternative.

**Table 7**

	<b>Preferred Alternative</b>	<b>Status Quo Alternative</b>	<b>Alternative 3 Limiting all retail and commercial activity within industrial zones</b>	<b>Alternative 4 Liberal approach to land use within industrial zones</b>
Appropriateness	<p><b>Description: Industrial zones – Function and Role</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving the objectives.</p> <p><b>Description: Industrial zones – Amenity and Environment</b> Having regard to its efficiency and effectiveness, and taking into account the costs and benefits, it is concluded that the policies and the associated methods are the most appropriate to achieving the objectives.</p>	The status quo approach to industry is similar to that of the Unitary Plan, but has insufficient certainty in supplying new vacant land to meet demand. In many cases, the status quo approach allows conversion of industrial land to other, non-industrial uses, such as large format retail, intensive office activities and residential.	The approach would not find overall support in Part 2 of the Resource Management Act	<p>This approach would be unable, in the short term, to meet the requirements of Part 2 of the RMA. Unconstrained industrial activities would be unable to avoid, remedy or mitigate their adverse environmental effects.</p> <p>In the longer term, and in an ad-hoc manner across Auckland, a liberal approach to land use would allow the land to be converted to activities paying a higher rent. This would effectively deplete the supply of land for industrial activities, which would need to be constantly moving further away from urban land and its resident workforce.</p>
Effectiveness	<p><b>Description: Industrial zones – Function and Role</b> The policy and methods are effective, given that they seek to avoid non-industrial activities within the Light and Heavy Industry zones where there is a more appropriate alternative.</p> <p><b>Description: Industrial zones – Amenity and Environment</b> The policy and methods are effective, given that they seek to generate a level of amenity appropriate to an industrial environment.</p>	<p>This approach would not be effective as, in many cases, the status quo approach allows conversion of industrial land to other, non-industrial uses, such as large format retail, intensive office activities and residential.</p> <p>Some legacy zones had greater amenity and built form requirements in the industrial zones. This is effective in terms of creating a higher amenity environment, but less effective in terms of focusing business investment on productive activities rather than built form and appearance.</p>	The approach would not be effective in that is overly impractical and overly prescriptive	<p>In the longer term, and in an ad-hoc manner across Auckland, a liberal approach to land use would allow the land to be converted to activities paying a higher rent. This would effectively deplete the supply of land for industrial activities, which would need to be constantly moving further away from urban land and its resident workforce.</p>
Efficiency	<p><b>Description: Industrial zones – Function and Role</b> The policy and methods can be implemented for a minor cost, acknowledging that there is capacity within centres to accommodate a wide range of office and retail activities. The agglomeration of similar activities also provides the best means whereby reverse sensitivity effects can be avoided.</p> <p><b>Description: Industrial zones – Amenity and Environment</b> The policy and methods can be implemented for a moderate cost. The areas are recognised as ‘working’ or productive environments where a lower standard of amenity and built form than in other parts of the region is expected. Industrial activities should be able to proceed with minimal regulatory oversight in terms of amenity and built form. The provisions do focus on managing the adverse effects of industrial activities at the interface with more sensitive zones. These provisions are considered efficient as they focus on getting the most out of the productive elements of the zone.</p>	Some legacy zones had greater amenity and built form requirements in the industrial zones. This is not considered efficient due to the focus on amenity in what is essentially a productive zone.	This option can be implemented at a major cost, principally in relation to the inability to provide ancillary retail and office activities, or retail and service activities that provide for the convenience needs of local employees.	Easily implemented, by removing or releasing controls, but refer to long-term lack of effectiveness above.
Costs	<p><b>Description: Industrial zones – Function and Role</b> <b>Social</b> <i>to the community:</i> Reduction in choice for the provision of office and retailing, which will be less able to locate in industrial zones, and may limit the enablement of groups of individuals with easier</p>	Costs resulting from the need to locate new and replacement industrial land further out on the periphery of the urban area.	Limitation of flexible development options to business owners. Lessened ability to provide for convenience service, food and	Costs of not controlling and protecting the supply of industrial land of appropriate size and type, in appropriate locations, are significant

	<p>access to those zones.</p> <p><i>to the council:</i> No material costs are anticipated from these policies. Council will need to undertake more proactive approaches to planning for future growth to provide for employment opportunities to serve the growing population.</p> <p><i>To business owners:</i> No material costs are anticipated from these policies. There would be significant costs to not zoning land for industrial activities, in terms of reduced opportunities to operate in Auckland.</p> <p>-(Limited) costs from reduction of opportunities for activities requiring small sites, partly balanced by multiple tenancies on some large lots.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> High demand pressure for industrial land, and significant impacts on the economy if not supplied.</p> <p>-(Limited) reduction in employment diversity opportunities at the local and neighbourhood level, for retail and office work, but balanced by increased overall employment opportunities as land is managed better and brownfield redevelopment opportunities are utilised.</p> <p><i>to the council:</i> Administration costs associated with lack of flexibility for developing industrial zones, and increased cost involved with a more proactive planning approach.</p> <p><i>To business owners:</i> Potential minor increase in property development costs associated with development within the commercial centres network due to restricting the ability of retail and office development to locate within industrial zones. This can be balanced by providing more opportunities for commercial development elsewhere.</p> <p>-Compliance with local and strategic environmental standards, where office and retail development must locate in higher amenity zones.</p> <p>-Potential (limited) decreased range of potential uses a property can be utilised for.</p> <p>-(Limited) costs from reduction of opportunities for activities requiring small sites, partly balanced by multiple tenancies on some large lots.</p> <p><b>Environment:</b> There are no anticipated environmental costs as a result of this policy. There are potential reverse sensitivity issues with industrial zones, where they are near more sensitive activities, and these can limit the role and function of industry if not managed well.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p> <p><b>Description: Industrial zones – Amenity and Environment</b></p> <p><b>Social</b></p> <p>Some social costs may occur in relation to lower amenity industrial areas. Reverse sensitivity issues can arise in relation to the concentrated and perceived emissions of industrial zones (air quality, dust, noise, odour) which can constrain employment opportunities if not well-managed.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> No material economic costs anticipated.</p> <p><i>to the council:</i> Administration costs</p> <p><i>To business owners:</i> Increased expectations and compliance with the provision of landscape treatment for properties.</p> <p>-Air quality can be costly, even where the zone allows a greater level of emissions.</p> <p><b>Environment:</b> There are no anticipated environmental costs as a result of this policy.</p> <p><b>Cultural:</b> There are no anticipated cultural costs as a result of this policy.</p>	<p>Costs resulting from the increased requirements for amenity in industrial areas.</p>	<p>beverage and service station activities to enable local employee base.</p> <p>Would in some instances artificially sever administrative and retail activities which are ancillary to core productive uses.</p> <p>Administration costs associated with extent of assessments required for ancillary retail and office activities with little propensity for reverse sensitivity effects or distributional impacts</p>	<p>for the economy and for the community. industrial activity employs many people, who would need to travel further to work. Costs of doing business would be not be stable, as alternative land uses could replace industrial activity.</p>
Benefits	<p><b>Description: Industrial zones – Function and Role</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Benefits in terms of a consistent and acceptable level of amenity and character, and reduction in reverse sensitivity effects.</p> <p>-Limited retail provided for enables employees and those close to the Light Industry zone who may benefit from accessible food and beverage, service stations and dairy provision.</p> <p>-Enabling trade suppliers in the Light Industry zone to locate in an appropriate location to meet needs of the wider community, where such needs may not be met if such retail types are limited to the commercial centres (or the General Business zone) where their establishment may prove</p>	<p>Benefits in terms of the potentially improved appearance of some industrial areas, due to the higher amenity requirements in the rules.</p>	<p>Reduces propensity for reverse sensitivity effects</p> <p>Would (to a limited extent) reduce the uptake of industrial land by non-industrial activities.</p>	<p>'Highest and best' use of resources is promoted, and redeployment of industrial activity can facilitate that change in land use. This is common historically, with many parts of inner Auckland having had workshops and industrial buildings converted to apartments and mixed use, and newer industrial and commercial businesses</p>

	<p>problematic.</p> <p><i>to the council:</i> No material social benefits</p> <p><i>to business owners:</i> No material social benefits, except opportunities for large site operations are protected and increased.</p> <p><b>Economic:</b></p> <ul style="list-style-type: none"> <li><i>to the community:</i> Clearer delineation of industrial zones as suitable locations for a range of industrial and accessory activities.</li> <li>-As a subsequent benefit, improved amenity and functioning of the centre reduces likelihood of centre decline.</li> <li>-Managing land use to avoid increasing land values and pressure on industrial activities to relocate.</li> <li>-Improved management of amenity effects at transitional boundaries reduces the impact on adjacent residential amenity, including economic impacts.</li> <li><i>to the council:</i> Ability to plan community infrastructure in relation to the needs of industrial activity.</li> <li>-Greater ability to manage the limited resource of industrial land.</li> <li><i>to business owners:</i> Increased certainty to business owners regarding investment decisions.</li> <li>-Reduced displacement of industrial activities by retail activities to maintain the integrity of industrial locations</li> <li>-Increased/protected supply of large sites for land intensive industrial activity.</li> </ul> <p><b>Environmental:</b> Addressing local and strategic effects of industrial activity throughout Auckland and directing industrial activity principally towards accommodation in the industrial zones, thereby providing for these activities to better internalise their effects.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p> <p><b>Description: Industrial zones – Amenity and Environment</b></p> <p><b>Social:</b></p> <p><i>to the community:</i> Provisions relating to requirements for landscaping and avoidance of adverse effects on neighbouring residential and open space zones will make these areas more pleasant.</p> <p><i>to the council:</i> No material social benefits</p> <p><i>to business owners:</i> No material social benefits.</p> <p><b>Economic:</b></p> <p><i>to the community:</i> Improved amenity and functioning of the centre reduces likelihood of centre decline.</p> <p>-Decrease of amenity degradation at transitional boundaries as a proxy indication of reduction in housing economic value.</p> <p><i>to the council:</i> No material economic benefits.</p> <p><i>to business owners:</i> Certainty to business owners as to the moderate level and extent of amenity expected, and accordingly anticipated within the industrial zones.</p> <p><b>Environmental:</b> Benefits in terms of a consistent and acceptable level of amenity and character.</p> <p><b>Cultural:</b> There are no anticipated cultural benefits as a result of this policy.</p>			displacing older, less intensive industry.
Risks	<p><b>Description: Industrial zones – Function and Role</b></p> <p>If industrial land is not managed adequately there is increased pressure on land demand and land values, reflecting a shortfall in supply.</p> <p><b>Description: Industrial zones – Amenity and Environment</b></p> <p>There are no material risks associated with these policies, except that setting amenity standards or expectations too high could make developed industrial land more expensive and also lead to inefficient use of the land area resource.</p>	<p>The key risk with the status quo approach is that industrial land is not in sufficient supply, and is continuing to be converted to other, non-industrial uses. There is inadequate provision of industrial land to meet demand.</p>	<p>The key risk is the inefficient use of the industrial zones. There is inadequate provision of industrial land to meet demand.</p>	<p>The key risk in a more liberal approach to land use regulation is the displacement of industrial activities. There is inadequate provision of industrial land to meet demand.</p>

### **8.13 Conclusion**

Auckland has a diminishing supply of zoned land for manufacturing and other related industrial activities, commonly termed Group 1 industrial activities – including manufacturing, transport and storage, wholesale trade, construction. To address this land supply issue, the Unitary Plan: identifies and zones greenfield land to accommodate the growth of Group 1 industrial activities for the planned forecast of demand, including into the future urban zones within the RUB; seeks to incentivise the utilisation of Auckland's existing stock of under-utilised brownfield industrial land, and restricts activities that are not necessary to be located within industrial zones.

Recognising and differentiating industrial zones within Auckland is important in terms of providing for the ability to apply amenity and character provisions based on the likely anticipated scale, density and intensity industrial activity that can be anticipated within each zone type. It will also provide a framework for linking together the expected environmental impacts anticipated within each zone, and the likely range of activities therefore enabled.

## 9 Record of Development of Provisions

### 9.1 Information and Analysis

#### 9.1.1 Supporting resources

In addition to the reports and documentation completed in preparation for the review of the Auckland Plan and Unitary Plan, the following documents have been completed specifically for the review of the business provisions:

Document	Purpose/Description	Date	Appendix
Case law - centres and commercial activity		-	3.4.1
Proposed Change 6 Environment Court Evidence	Background information to strategic position	2008	3.4.2
<i>Auckland retail growth projections</i>	Short background to regional retail growth projections	2013	3.4.3
<i>Industrial Land Demand</i>	Short background to regional industrial land requirements, based on Property Economics 2009 predictions	2013	3.4.4
<i>Change 6 to the Auckland RPS</i>	RPS strategic growth provisions	2011	-
<i>Auckland Plan</i> Auckland Council	Strategic plan for growth	2012	-
<i>Draft Auckland Plan – Technical Report: Centres and Corridors</i> Auckland Council	Analysis of centres strategy, hierarchy and criteria	2011	3.4.5
<i>Prioritising Centres</i> Auckland Council	Summarises the analysis of 80 centres across the Auckland region to aid the process of prioritising sustainable compact centres.	2011	3.4.6
<i>Group 1 Additional Greenfield Land Requirements, 2001-2031.</i> Market Economics	Projection of industrial greenfield land requirements	2007	3.4.7
<i>Capacity for Growth Study</i> Auckland Council	Report on residential, business and rural land availability in Auckland	2012	3.4.8
<i>Auckland Retail Economic Evidence Base</i> Fairgray, S RIMU Auckland Council	Existing retail distribution, and region-wide retail supply-demand balance	2013	3.4.9
Auckland Council and Market Economics Economic Futures Model	Model used to project future economic outputs in region.  Not attached as an appendix as the model outputs differ based on different assumptions and inputs to the model.	2013	-

### **9.1.2 Consultation Undertaken**

See Appendix 3.39.2.

### **9.2 Decision-making**

See Appendix 3.39.3.